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-and-

HAYWARD PLLC

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Counsel for Highland Capital Management, L.P.

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS **DALLAS DIVISION**

HIGHLAND CAPITAL MANAGEMENT, L.P.,	§ §	
Plaintiff,	§ §	
vs.	§ §	Adv. Proc. No. 21-03003-sgj
JAMES DONDERO, NANCY DONDERO, AND THE DUGABOY INVESTMENT TRUST,	§ § §	Case No. 3:21-cv-00881-X
Defendants.	§ §	
	§	

THOTILITY CIT ITTIL WITH MOLVIENT, E.I.,	§ §
Plaintiff.	§ Adv. Proc. No. 21-03004-sgj §
vs.	§ § § Case No. 3:21-cv-00881-X
HIGHLAND CAPITAL MANAGEMENT FUND ADVISORS, L.P.,	S Case No. 3:21-cv-00881-X S S S S
Defendant.	\$ \$ \$ \$
HIGHLAND CADITAL MANACEMENT LD	\$ \$
Plaintiff,	§ Adv. Proc. No. 21-03005-sgj
vs.	§ §
THE DUGABOY INVESTMENT TRUST,	\$ Case No. 3:21-cv-00881-X \$
Defendants.	§ §
HIGHLAND CAPITAL MANAGEMENT, L.F.,	§ §
Plaintiff,	§ Adv. Proc. No. 21-03006-sgj
***	§ §
HIGHLAND CAPITAL MANAGEMENT SERVICES, INC., JAMES DONDERO, NANCY DONDERO, AND THE DUGABOY INVESTMENT TRUST,	\$ \$ Case No. 3:21-cv-00881-X \$ \$ \$
Defendants	§ §

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

Vs.

Plaintiff,

S

Case No. 3:21-cv-00881-X

HCRE PARTNERS, LLC (n/k/a NexPoint Real Estate Partners, LLC), JAMES
DONDERO, NANCY DONDERO, AND
THE DUGABOY INVESTMENT TRUST,

Defendants.

S

Adv. Proc. No. 21-03007-sgj

S

Case No. 3:21-cv-00881-X

NOTICE OF ATTORNEYS' FEES CALCULATION <u>AND BACKUP DOCUMENTATION</u>

PLEASE TAKE NOTICE that Highland Capital Management, L.P. ("Highland" or "Plaintiff"), the reorganized debtor in the above-captioned chapter 11 case (the "Bankruptcy Case") and plaintiff in the above-referenced adversary proceedings (the "Adversary Proceedings") hereby files this Notice of Attorney's Fees Calculation and Backup Documentation (the "Notice") in support of its Proposed Form of Judgment, in accordance with the Court's directive in its Report and Recommendation to District Court: Court Should Grant Plaintiff's Motion for Partial Summary Judgment Against All Five Note Maker Defendants (With Respect to All Sixteen Promissory Notes) in the Above-Referenced Consolidated Note Actions [Docket No. 191] (the "R&R"), filed on July 19, 2022.

1. Attached as **Exhibit 1** is the *Declaration of John A. Morris in Support of Highland Capital Management, L.P.'s Proposed Form of Judgment* (the "Morris Declaration"), and backup documentation supporting the calculation of attorneys' fees.

[Remainder of Page Intentionally Blank]

Dated: August 5, 2022 PACHULSKI STANG ZIEHL & JONES LLP

Jeffrey N. Pomerantz (CA Bar No. 143717) John A. Morris (NY Bar No. 2405397) Gregory V. Demo (NY Bar No. 5371992) Hayley R. Winograd (NY Bar No. 5612569) 10100 Santa Monica Blvd., 13th Floor

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Email: jpomerantz@pszjlaw.com jmorris@pszjlaw.com gdemo@pszjlaw.com hwinograd@pszjlaw.com

-and-

HAYWARD PLLC

/s/ Zachery Z. Annable

Melissa S. Hayward Texas Bar No. 24044908 MHayward@HaywardFirm.com Zachery Z. Annable Texas Bar No. 24053075 ZAnnable@HaywardFirm.com 10501 N. Central Expy, Ste. 106 Dallas, Texas 75231

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Counsel for Highland Capital Management, L.P.

EXHIBIT 1

DECLARATION OF JOHN A. MORRIS IN SUPPORT OF HIGHLAND CAPITAL MANAGEMENT L.P.'S PROPOSED FORM OF JUDGMENT

I, John A. Morris, pursuant to 28 U.S.C. § 1746, under penalty of perjury, declare as follows:

- 2. I am a partner in the law firm Pachulski, Stang, Ziehl & Jones LLP (the "Firm"), counsel to Highland Capital Management, L.P. ("Highland" or "Plaintiff"), the Reorganized Debtor in the above-captioned chapter 11 case (the "Bankruptcy Case") and the plaintiff in the above-referenced adversary proceedings (each, a "Note Litigation," and collectively, the "Notes Litigation"). I submit this Declaration in support of *Highland Capital Management*, L.P.'s Proposed Forms of Judgment (the "Proposed Judgments").
- 3. I have overseen my Firm's representation of Plaintiff in all aspects of the Notes Litigation. This Declaration is based on my personal knowledge and review of the documents listed below.
- 4. On July 19, 2022, the Bankruptcy Court rendered a *Report and Recommendation to District Court: Court Should Grant Plaintiff's Motion for Partial Summary Judgment Against All Five Note Maker Defendants (With Respect to All Sixteen Promissory Notes) in the Above-Referenced Consolidated Note Actions (the "R&R"). In the R&R, the Court directed Highland to "submit a form of Judgment applicable to each Note Maker Defendant that calculates proper amounts due pursuant to th[e] Report and Recommendation, including interest accrued to date (and continuing per diem), as well as attorneys' fees incurred." R&R at 44-45.*

¹ Identical copies of the R&R were filed in Adv. Pro. No. 21-03003 at Docket No. 191; Adv. Pro. No. 21-03004 at Docket No. 163; Adv. Pro. No. 21-03005 at Docket No. 207; Adv. Pro. No. 21-03006 at Docket No. 213; and Adv. Pro. No. 21-03007 at Docket No. 208.

5. As set forth below, and in accordance with the Court's direction in the R&R, I and others working at my direction have reviewed invoices related to the attorneys' fees and expenses charged to Highland in the Notes Litigation and calculated the amount of attorneys' fees and expenses incurred in connection therewith.

A. Attorneys' Fees Charged by Pachulski Stang Ziehl & Jones LLP

- 6. In the ordinary course of business, timekeepers (including attorneys and legal assistants) at my Firm record billable time in increments of one-tenth of an hour. Timekeepers are also required to classify their work by task codes and/or matter numbers to differentiate between individual tasks conducted for the same client.
- 7. For the period December 1, 2020, until August 10, 2021, the Firm's timekeepers recorded their time entries relating to the Notes Litigation under matter number ".002" and task code "BL" (short for "Bankruptcy Litigation"). Attached as **Exhibit A** are the Firms' invoices for the period December 1, 2020, through August 10, 2021, that reflect all of the Firm's time billed to the Notes Litigation.
- 8. For the period August 11, 2021, through December 31, 2021, the Firm's timekeepers recorded their time entries relating to the Notes Litigation under matter number ".003" and task code "NL" (short for "Notes Litigation"). Attached as **Exhibit B** are the Firm's invoices for the period August 11, 2021, through December 31, 2021, that reflect all of the Firm's time billed to the Notes Litigation.
- 9. On January 1, 2022, the Firm created a new matter number (".004") for timekeepers to record their time entries relating to the Notes Litigation. Attached as **Exhibit C** are the Firm's invoices for the period January 1, 2022, through July 31, 2022, that reflect all of the Firm's time billed to the Notes Litigation.

- 10. We have reviewed the attached invoices and redacted all entries that we concluded were inadvertently coded or charged to the Notes Litigation ("<u>Misapplied Time</u>"). Based on that review, we believe the attached invoices capture and reflect fees properly charged by my Firm to Highland with respect to the Notes Litigation.
- 11. For the period December 1, 2020 through July 31, 2022, the attorneys' fees billed by the Firm's timekeepers with respect to the Notes Litigation and charged to Highland are in the total aggregate amount of \$2,663,585.30 (the "Fees").

B. Third-Party Expenses Incurred In Connection with the Notes Litigation

- 12. In order to conserve resources, the Firm retained a third-party litigation support from a firm called "Robert Half" to review documents for responsiveness and privilege in connection with the Notes Litigation. Attached as **Exhibit D** are the invoices for services rendered by Robert Half in connection with the Notes Litigation for the period December 1, 2020 through July 31, 2022 (the "Robert Half Expenses").
- 13. Finally, Highland took and defended numerous depositions in connection with the Notes Litigation. Attached as **Exhibit E** are invoices rendered by TSG Reporting, Inc. for court reporting services rendered in connection with the Notes Litigation for the period December 1, 2020 through July 31, 2022 (the "Court Reporting Expenses," and together with the Robert Half Expenses, the "Expenses").
- 14. For the period December 1, 2020 through July 31, 2022, the Expenses incurred by the Firm and charged to Highland with respect to the Notes Litigation are in the total aggregate amount of \$57,460.55.

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C. Summary of All Fees and Expenses Incurred by Highland in the Notes Litigation

15. Attached as **Exhibit F** is chart showing that the aggregate amount of all

Fees and Expenses charged to Highland in connection with the collection of the Notes is

\$2,797,105.35.

16. As the Court is aware, there was substantial overlap in the legal and factual

issues in the five adversary proceedings. Consequently, there was no reasonable way to allocate

the Fees and Expenses separately between each Note Litigation and we believe the fairest method

of allocating the Fees and Expenses under the circumstances is to charge each Defendant for one-

fifth the total, or \$559,421.07.

17. I declare under penalty of perjury that the forgoing is true and correct.

Dated: August 5, 2022

/s/ John A. Morris
John A. Morris

EXHIBIT A

Case 21-03006-sgj Doc 219 Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingent** Filed 08/05/23 Entered 08/05/23 Entered

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10100 Santa Monica Blvd. 13th Floor Los Angeles, CA 90067

Board of Directors Highland Capital Management LP 300 Crescent Court ste. 700 Dallas, TX 75201

Dallas, TX 75201

December 31, 2020
Invoice 126769
Client 36027
Matter 00002
JNP

RE: Postpetition

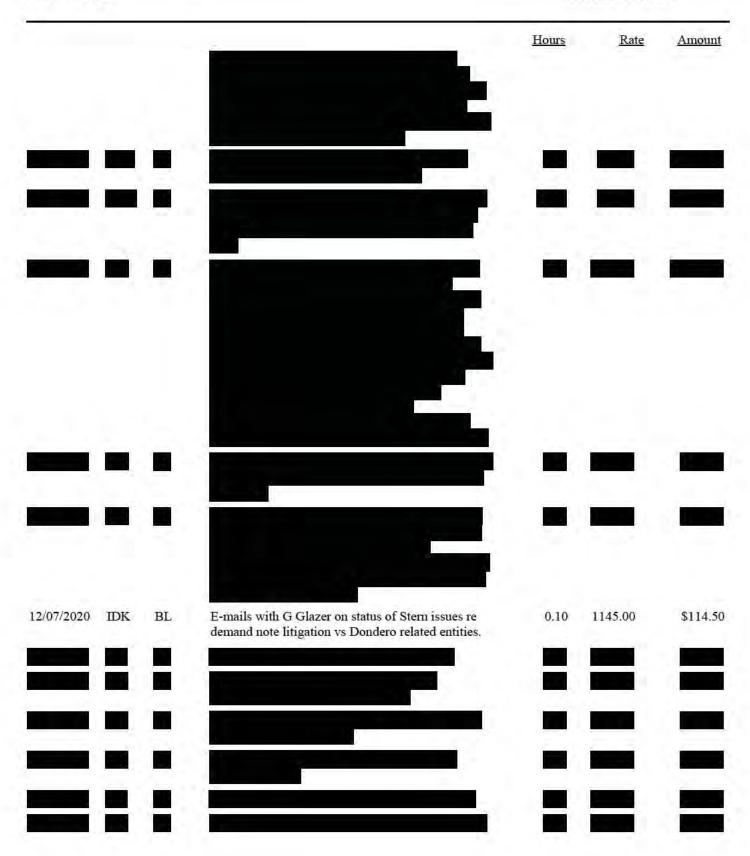
STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/2020



Page: 21 Invoice 126769 December 31, 2020

_					-	_
-						
12/05/2020	GIG	BL	Research re bankruptcy court jurisdiction over note claims	2.20	895.00	\$1,969.00
				Hours	Rate	

Page: 22 Invoice 126769 December 31, 2020



Page: 24 Invoice 126769 December 31, 2020

				Hours	Rate	Amount
12/07/2020	GIG	BL	Research re bankruptcy court jurisdiction over note	5.50	895.00	\$4,922.50
12/07/2020	GIG	BL	claims Research re bankruptcy court jurisdiction over note	4.30	895.00	\$3,848,50
			claims			
		-				

Page: 26 Invoice 126769 December 31, 2020

			<u>Hours</u>	Rate	Amount
GIG	BL	Research re bankruptcy court jurisdiction over note claims	1.20	895.00	\$1,074.00
GIG	BL	Prepare memo re jurisdiction issue	6.90	895.00	\$6,175.50
GIG	BL	Emails Ira D. Kharasch re jurisdiction memo	0.10	895.00	\$89.50
IDK	BL			1145.00	
		with J. Pomerantz, others, , demand note upcoming litigation, (.8).			
					-
	IDK	GIG BL GIG BL IDK BL	claims GIG BL Prepare memo re jurisdiction issue GIG BL Emails Ira D. Kharasch re jurisdiction memo IDK BL Attend conference call with J. Pomerantz, others, , demand note upcoming litigation, (.8).	GIG BL Research re bankruptcy court jurisdiction over note claims GIG BL Prepare memo re jurisdiction issue 6.90 GIG BL Emails Ira D. Kharasch re jurisdiction memo 0.10 IDK BL Attend conference call with J. Pomerantz, others, demand note upcoming litigation. (.8).	GIG BL Research re bankruptcy court jurisdiction over note claims GIG BL Prepare memo re jurisdiction issue 6.90 895.00 GIG BL Emails Ira D. Kharasch re jurisdiction memo 0.10 895.00 IDK BL Attend conference call with J. Pomerantz, others, demand note upcoming litigation. (8).

Page: 31 Invoice 126769 December 31, 2020



Page: 33 Invoice 126769 December 31, 2020



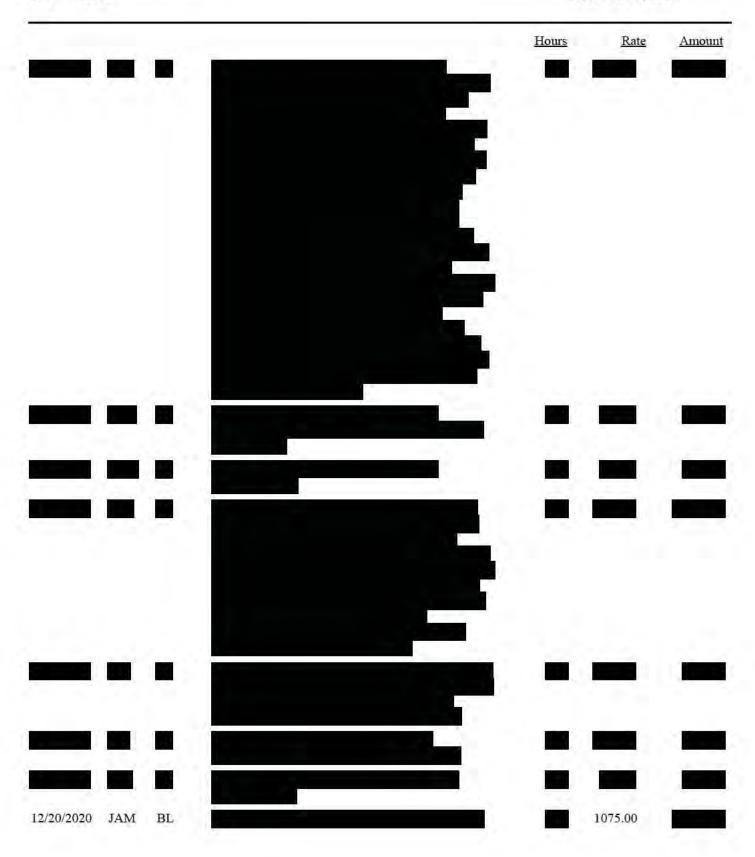
Page: 40 Invoice 126769 December 31, 2020



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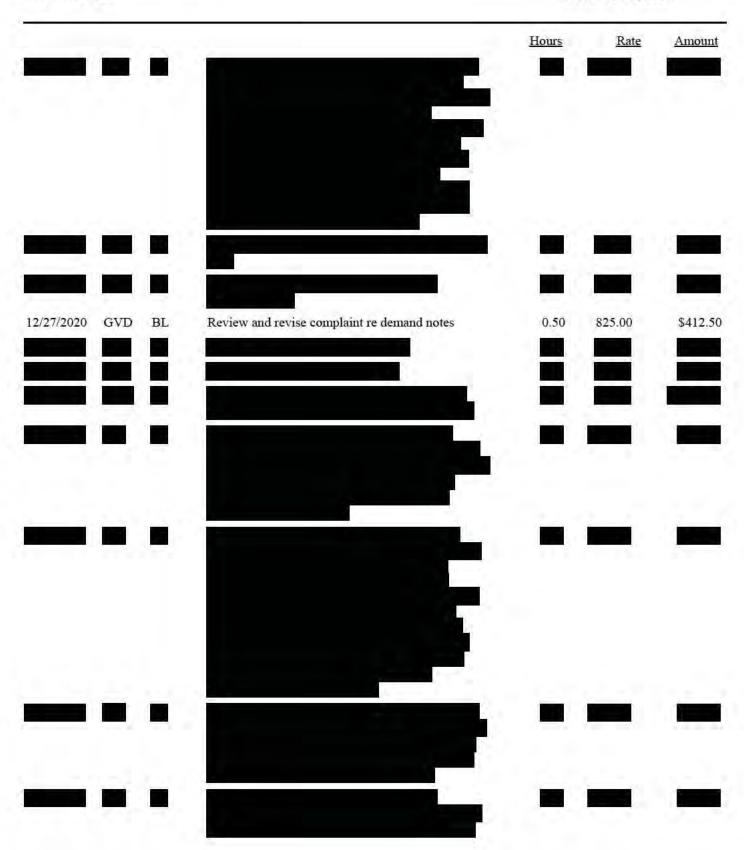
Page: 45 Invoice 126769 December 31, 2020



Page: 46 Invoice 126769 December 31, 2020

				Hours	Rate	Amount
			review/revise complaint against Dondero for breach of demand notes (0.8); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd, B. Levine re: complaint against Dondero (0.1).	_		
	ī			=		=
				=		
12/21/2020	JNP	BL	Review draft complaint against Dondero for demand notes.	0.10	1075.00	\$107.50
				-		
12/21/2020	JAM	BL	Telephone conference with J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: demand notes, (1.0): e-mail to J. Seery, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: complaint against Dondero (demand notes) (0.1).		1075.00	
	ī					

Page: 54 Invoice 126769 December 31, 2020



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10100 Santa Monica Blvd. 13th Floor Los Angeles, CA 90067

Board of Directors Highland Capital Management LP 300 Crescent Court ste. 700 Dallas, TX 75201 January 31, 2021
Invoice 127125
Client 36027
Matter 00002
JNP

RE: Postpetition

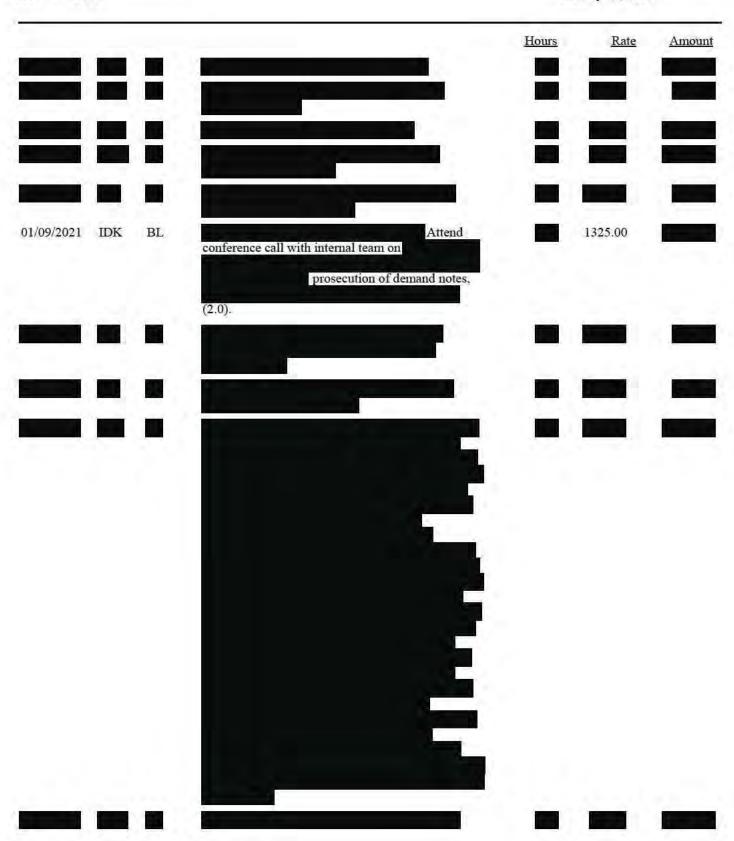
STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 01/31/2021



Page: 24 Invoice 127125 January 31, 2021



Page: 26 Invoice 127125 January 31, 2021



Page: 27 Invoice 127125 January 31, 2021



Page: 28 Invoice 127125 January 31, 2021

				Hours	Rate	Amount
_						
01/11/2021	IDK	BL	Telephone conference and e-mails with K Brown re prosecuting demand notes vs Dondero (.2).	0.20	1325.00	\$265.00
01/11/2021	IDK	BL	E-mails with B Levine re demand notes and need to commence actions and prior draft of complaint (.2); E-mails with local counsel re same re writs of attachment for same (.3).	0.50	1325.00	\$662.5
_						
				-		
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Page: 30 Invoice 127125 January 31, 2021



Page: 31 Invoice 127125 January 31, 2021



Page: 32 Invoice 127125 January 31, 2021



Page: 33 Invoice 127125 January 31, 2021



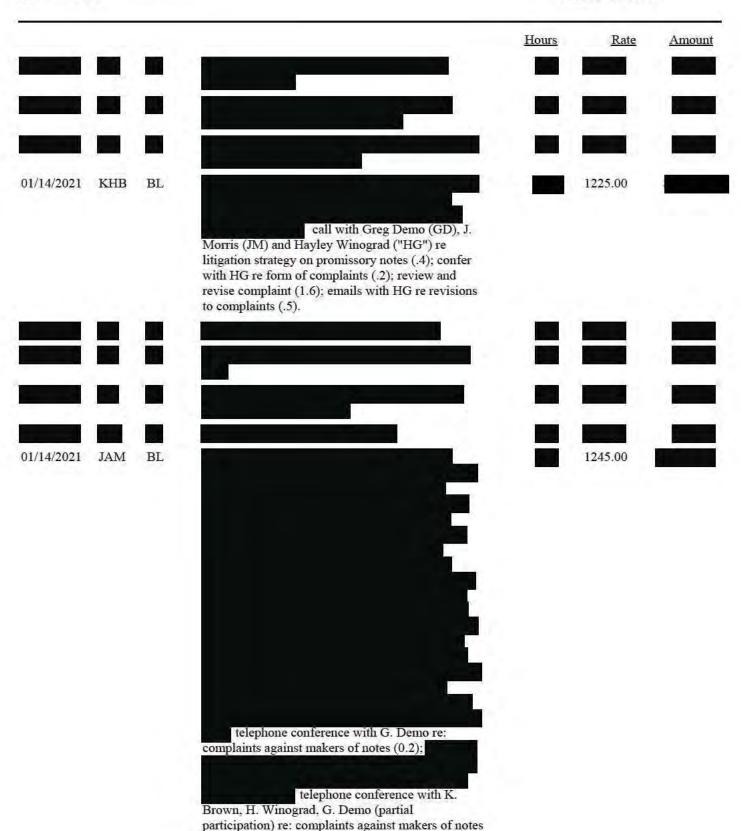
Page: 34 Invoice 127125 January 31, 2021



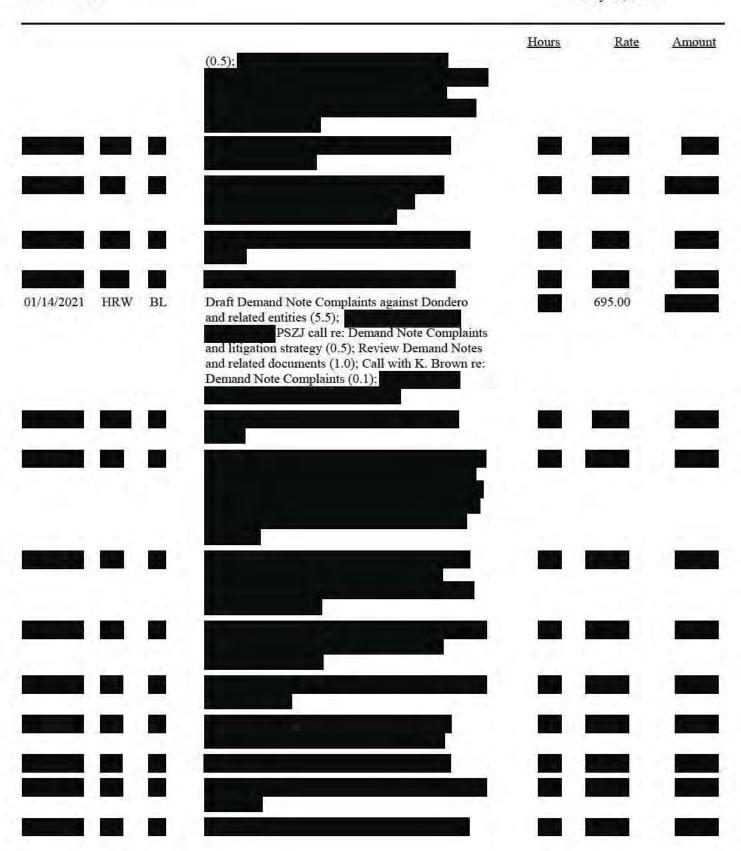
Page: 35 Invoice 127125 January 31, 2021

				Hours	Rate	Amount
	=					
1/13/2021	GVD	BL	Conference with K. Brown and H. Winograd re demand note issues	0.80	950.00	\$760.0
1/13/2021	HRW	BL	Call with G. Demo and K. Brown re: demand note complaints (0.6); Call with G. Demo re: demand note complaints (0.1);		695.00	
			Review Demand Notes and related documents (0.8) Draft Demand Note Complaints against Dondero and related entities (4.5).			
1/14/2021	IDK	BL	E-mails with H Winograd and J Morris re next steps on complaints on demand notes (.1).	0.10	1325.00	\$132.5
1/14/2021	JNP	BL	Review email regarding suits against noteholders and next steps.	0.10	1295.00	\$129.5

Page: 36 Invoice 127125 January 31, 2021



Page: 37 Invoice 127125 January 31, 2021



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				Hours	Rate	Amount
01/15/2021	КНВ	BL	Work on complaints on promissory notes (4.4). emails with G. Demo re payment on NPA note (.2); review draft letter to NPA re same (.2); email from J. Pomerantz re writs of attachment (.1); email from I. Kharasch re same (.1); emails with H. Winograd and G. Demo re complaints (.2).	5.20	1225.00	\$6,370.00
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01/15/2021	GVD	BL	Review and revise demand note complaint	0.30	950.00	\$285.00

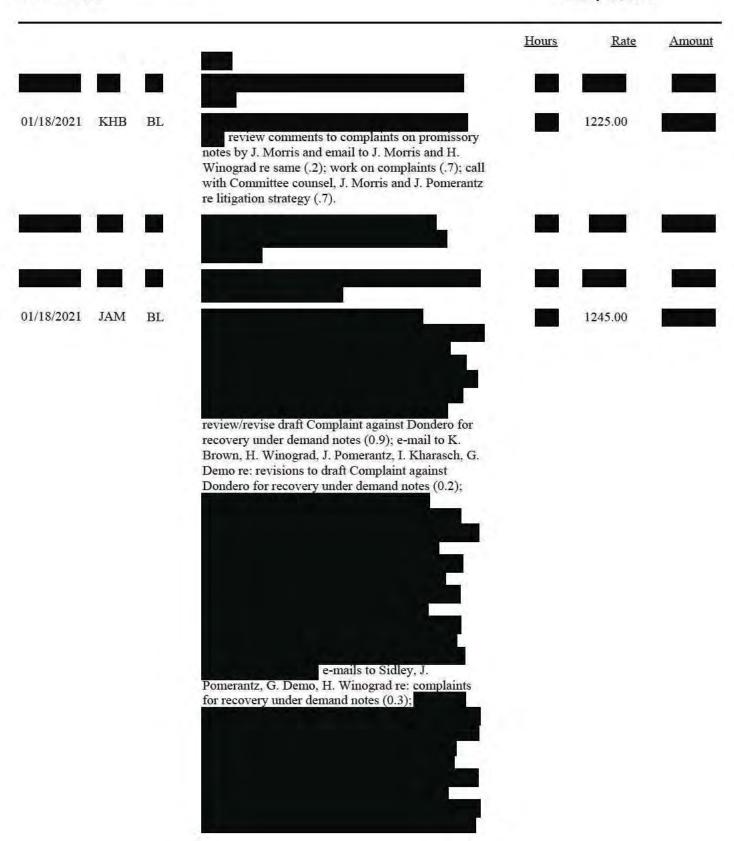
Page: 39 Invoice 127125 January 31, 2021



Page: 40 Invoice 127125 January 31, 2021



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Board of Directors Highland Capital Management LP 300 Crescent Court ste. 700 Dallas, TX 75201 February 28, 2021
Invoice 127314
Client 36027
Matter 00002
JNP

RE: Postpetition

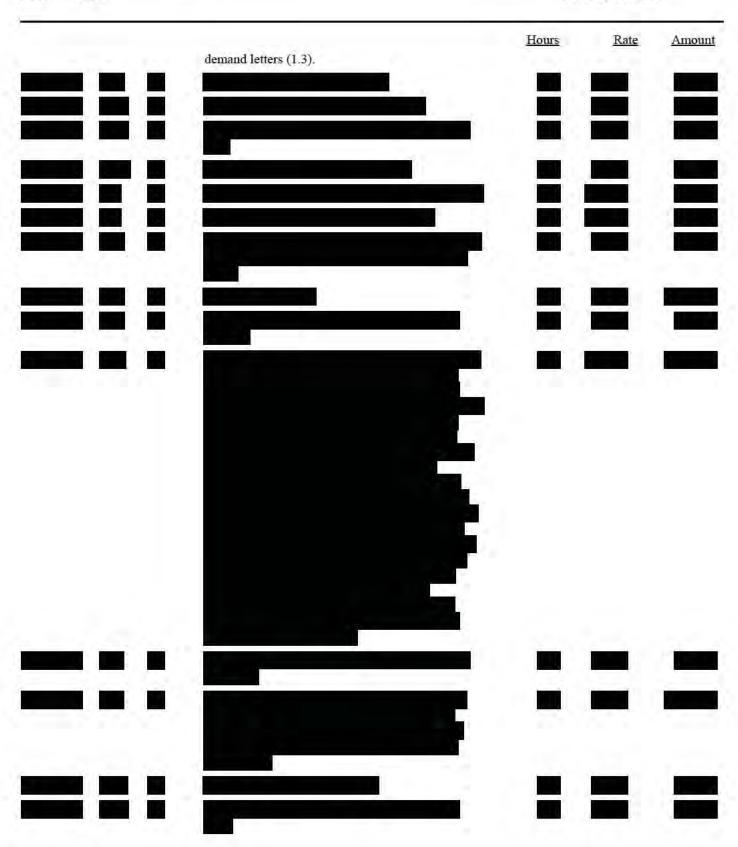
STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 02/28/2021



Page: 23 Invoice 127314 February 28, 2021



Page: 24 Invoice 127314 February 28, 2021



Page: 26 Invoice 127314 February 28, 2021

			Hours	Rate	Amount
IDK	BL	E-mails with G Demo re correspondence with Gov Re reps on counsel, as well as with CEO on demand notes (.2).	0.20	1325.00	\$265.00
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				_	
	=				
			= =		
			Re reps on counsel, as well as with CEO on demand notes (.2).	IDK BL E-mails with G Demo re correspondence with Gov Re reps on counsel, as well as with CEO on demand notes (.2).	IDK BL E-mails with G Demo re correspondence with Gov Re reps on counsel, as well as with CEO on demand notes (2).

Page: 27 Invoice 127314 February 28, 2021



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Pachulski Stang Ziehl & Jones LLP

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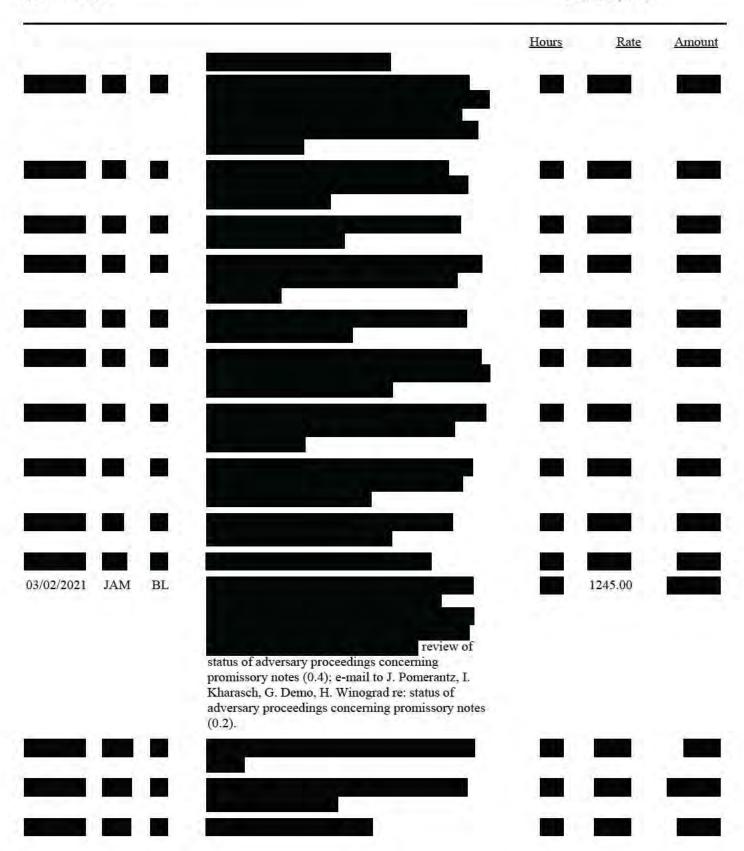
Board of Directors Highland Capital Management LP 300 Crescent Court ste. 700 Dallas, TX 75201 March 31, 2021 Invoice 127522 Client 36027 Matter 00002 JNP

RE: Postpetition

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 03/31/2021



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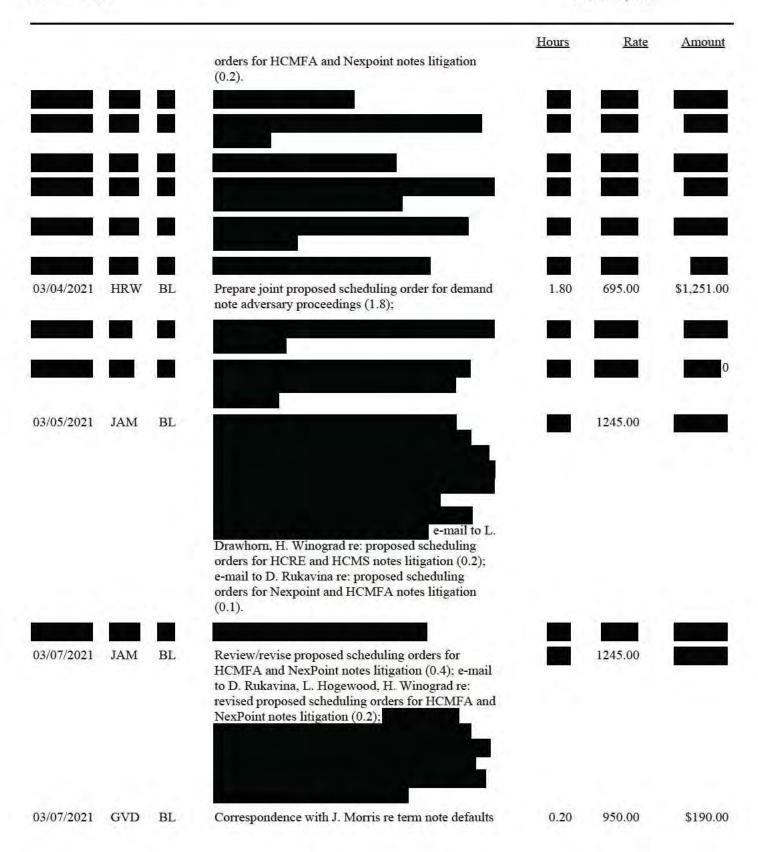
Page: 13 Invoice 127522 March 31, 2021

				Hours	Rate	Amount
03/02/2021	HRW	BL	Prepare joint proposed scheduling order for demand note adversary proceedings involving HCMFA and NPA (1.2); Review adversary proceedings and critical dates (0.6); Review NPA and HCMFA answer to complaints (0.4);		695.00	
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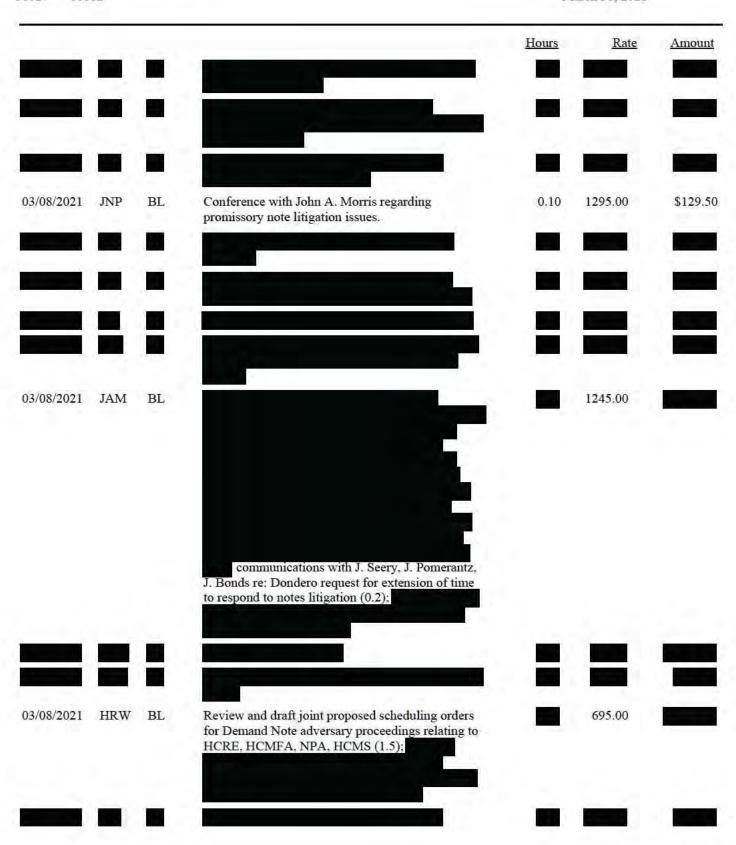
Page: 14 Invoice 127522 March 31, 2021



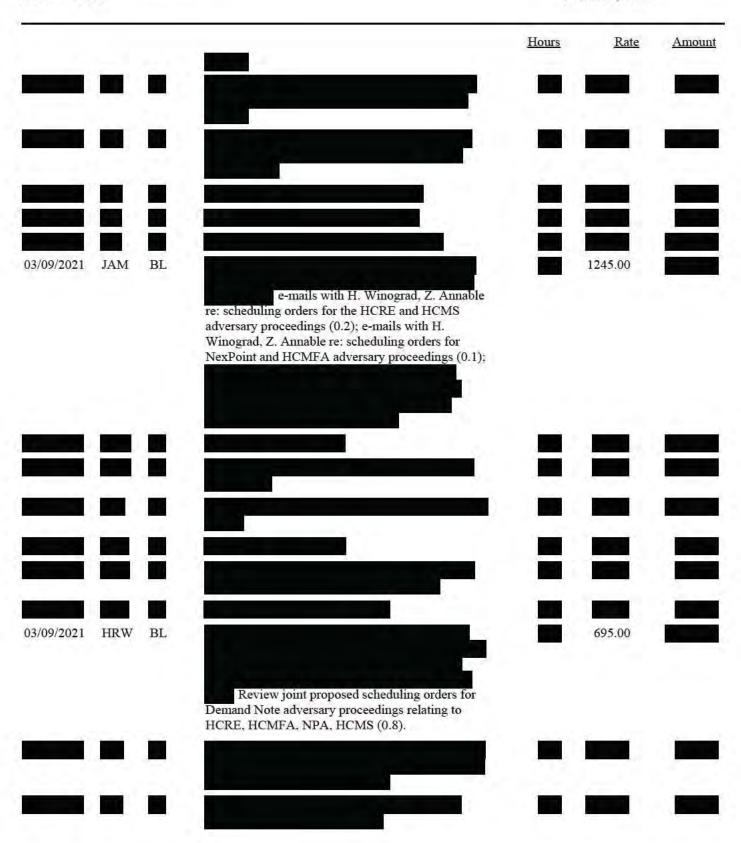
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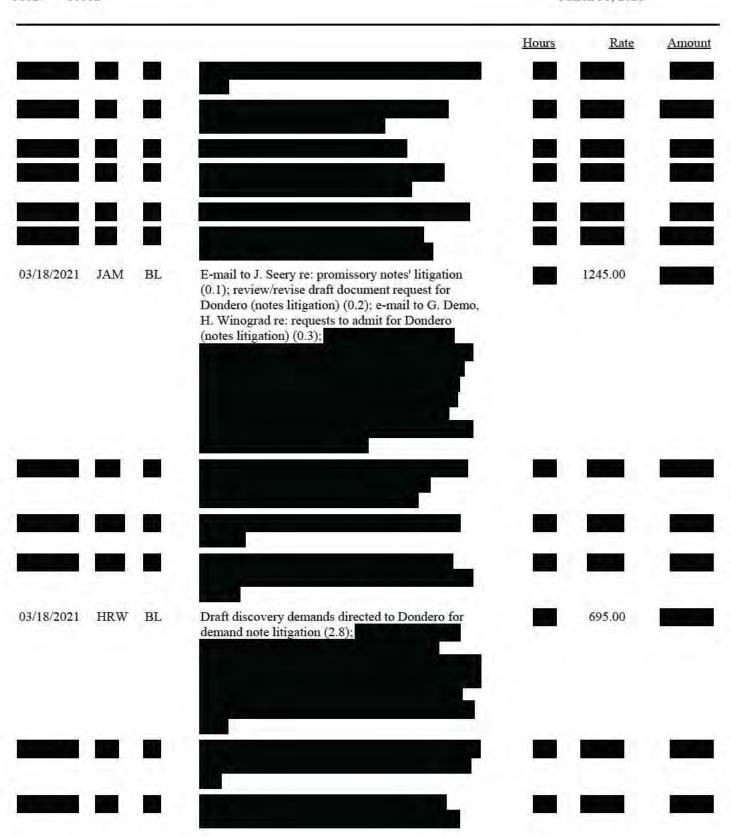
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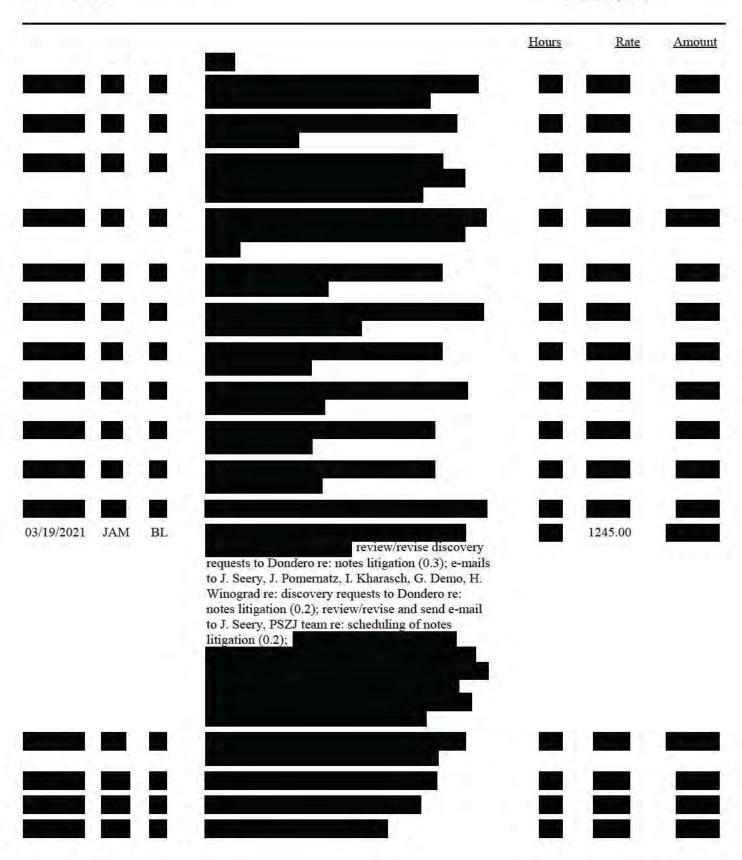
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				Hours	Rate	Amount
03/17/2021	JAM	BL	e-mail to J. Pomerantz, I.		1245.00	
	_		Kharasch, G. Demo, H. Winograd re: discovery of Dondero on notes litigation (0.7).		_	
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03/17/2021	HRW	BL	Review Dondero answer to demand note complaint (0.4); Draft email to Seery re: demand note litigation scheduling (1.0); Draft discovery demands directed to Dondero for demand note litigation (2.5).	3.90	695.00	\$2,710.5
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				Hours	Rate	Amount
03/25/2021	JAM	BL	E-mails to Bonds Ellis re: Debtor's discovery demands for Dondero notes litigation (0.3).	0.30	1245.00	\$373.50
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03/26/2021	JNP	BL	Review Dondero motion for continuance of note lawsuit.	0.10	1295.00	\$129.5
03/26/2021	JNP	BL	Review emails regarding Dondero note litigation	0.10	1295.00	\$129.5

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request for extension of trial date in notes litigation (0.2); telephone conference with J. Pomerantz re: status of notes litigation, Dondero request for extension of schedule (0.1); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: Dondero request for extension of trial date in notes litigation (0.1); e-mail to B. Assink re: Dondero request for extension of trial date in notes litigation (0.1); review Dondero demand notes and e-mail to D. Klos, B. Sharp, J. Pomerantz, G. Demo, H. Winograd re: same (0.5); review documents concerning Dondero demand notes (0.8); e-mail to K. Hendricks, D. Klos, B. Sharp, J. Pomerantz, G. Demo, H. Winograd re: facts/documents concerning Dondero demand notes (0.3); review Dondero motion to extend trial date in Notes litigation and emergency motion for expedited hearing (0.4); e-mail to J. Seery, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: Dondero motion to extend trial date in Notes litigation and emergency motion for expedited hearing (0.1); telephone conference with H. Winograd re: facts/objection to Dondero motion to extend trial date (0.2); telephone conference with J. Seery re: objection to Dondero motion to adjourn trial date (0.1).



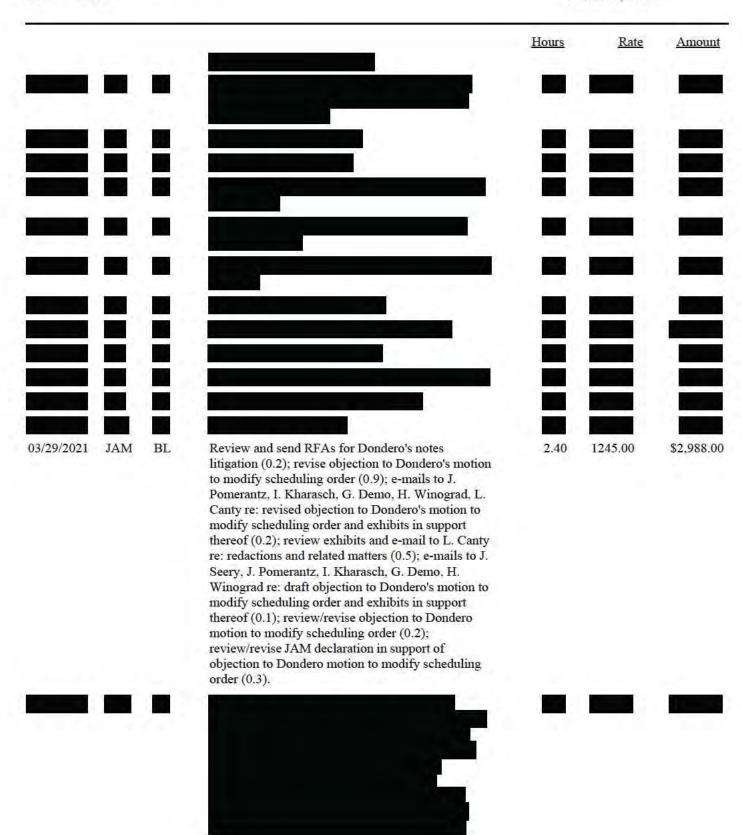
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				Hours	Rate	Amount
03/26/2021	GVD	BL	Conference with J. Morris re demand note issues	0.20	950.00	\$190.00
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03/26/2021	HRW	BL	Call with J. Morris re: objection to Dondero emergency motion for continuance of demand note proceeding (0.1); Review Dondero emergency motion for continuance of demand note proceeding (0.2); Draft request for admission directed to James Dondero in demand note proceeding (1.8).	2.10	695.00	\$1,459.50
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03/27/2021	JAM	BL	Review documents and draft objection to Dondero motion for continuance in notes litigation (4.4); e-mails to H. Winograd, L. Canty re: draft objection to Dondero motion for continuance in notes litigation (0.3); e-mail to D. Klos, K. Hendricks, J. Pomerantz, G. Demo, H. Winograd, B. Sharp re: facts concerning Notes litigation against Dondero (0.2).	4.90	1245.00	\$6,100.50
03/27/2021	LSC	BL	Review documents and retrieve and prepare exhibits in connection with Dondero Motion for Continuance in Notes Actions.	4.40	460.00	\$2,024.00

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				Hours	Rate	Amount
03/27/2021	HRW	BL	Draft objection to Dondero's emergency motion to continue demand note proceedings (5.0).	5.00	695.00	\$3,475.00
03/28/2021	JAM	BL	E-mails with D. Klos, K. Hendricks, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: facts relating to Dondero loans and notes (0.3); review/revise draft objection to Dondero motion to modify scheduling order (4.8); communications with J. Pomerantz, I. Kharasch, G. Demo, H. Winograd, L. Canty re: objection to Dondero motion to modify scheduling order (0.3); communications with H. Winograd, L. Canty re: RFAs directed to Dondero (notes litigation) (0.2).	5.60	1245.00	\$6,972.00
03/28/2021	LSC	BL	Continued preparation of exhibits in connection with Dondero Motion for Continuance in Notes Actions.	1.20	460.00	\$552.00
03/28/2021	HRW	BL	Draft objection to Dondero's emergency motion to continue demand note proceedings (4.5);		695.00	
03/29/2021	JNP	BL	Review opposition to motion by Dondero to continue trial on note litigation.	0.10	1295.00	\$129.50
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				Hours	Rate	Amount
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03/30/2021	JNP	BL	Emails regarding Court ruling on extending Dondero note litigation trial date.	0.10	1295.00	\$129.50
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03/30/2021	JAM	BL	Review/revise objection to Dondero motion to modify scheduling order (0.2); e-mails with Z. Annable, H. Winograd, L. Canty re: exhibits to objection to Dondero motion to modify scheduling order (0.1); e-mail to B. Assink, Bonds Ellis, J. Pomerantz, G. Demo, H. Winograd re: timing of discovery (0.2); e-mails with Z. Annable, G. Demo, H. Winograd re: objection to Dondero motion to modify scheduling order (0.2); communications with J. Seery, J. Pomerantz re: court's ruling on Dondero motion to modify scheduling order (0.2); e-mails with T. Surgent, J. Sommer re: results from e-mail searches in response to United subpoena (0.2).	1.10	1245.00	\$1,369.50
03/30/2021	LSC	BL	Redact additional exhibits (.3); research and review document productions for J. Morris and correspondence regarding the same (2.9).	3.20	460.00	\$1,472.00
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Case 21-03006-sgj Doc 219 Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingeint** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingeint** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingeint** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingeint** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingeint** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingeint** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingeint** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingeint** Filed 08/05/23 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**Potclingeint** Filed 08/05/23 Entered 08/05/23 Ente

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd. 13th Floor Los Angeles, CA 90067

Board of Directors Highland Capital Management LP 300 Crescent Court ste. 700

Dallas, TX 75201

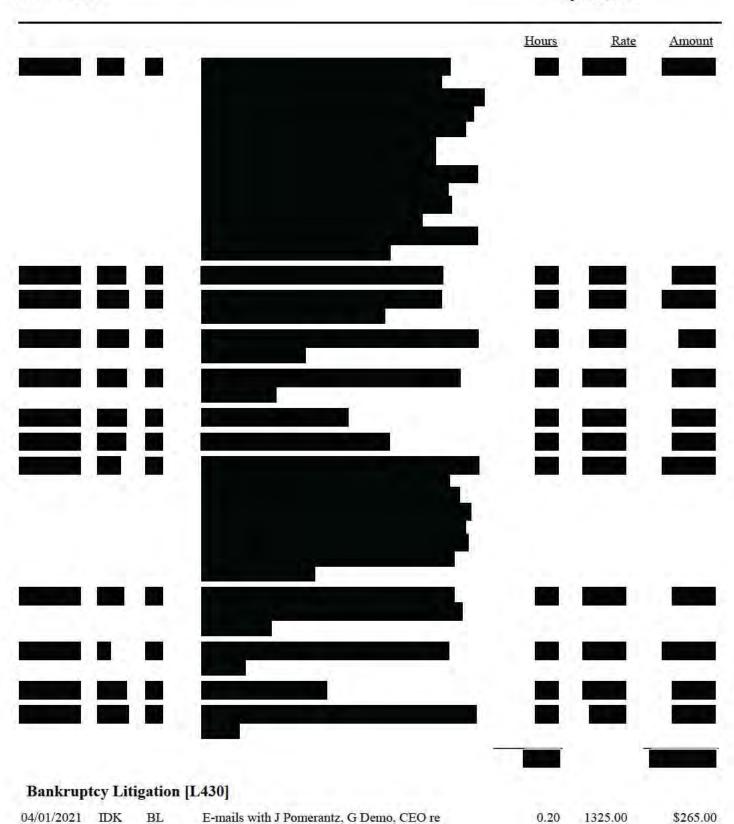
April 30, 2021 Invoice 127680 Client 36027 Matter 00002 JNP

RE: Postpetition

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2021



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			Dondero counsel correspondence re their intent to file motion to withdraw reference on collection actions and opposition (.2).			
			deficies and opposition (12):			
04/01/2021	JNP	BL	Emails to and from Gregory V. Demo regarding D. Rukavina email regarding withdrawal of the reference.	0.10	1295.00	\$129.50
04/01/2021	JNP	BL	Review and respond to email regarding withdrawal of reference for note lawsuits.	0.10	1295.00	\$129.50
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04/01/2021	JAM	BL	Telephone conference with H. Winograd re: discovery in AP against Advisors (notes litigation) (0.1); prepare discovery document requests and interrogatories for AP against Advisors (notes litigation) (0.9); review/revise requests for admission for AP against Advisors (notes litigation (0.3); e-mails with H. Winograd re: discovery requests for AP against Advisors (notes litigation (0.2):		1245,00	
			e-mail to D. Rukavina, H. Winograd re: discovery in AP against Advisors (notes litigation) (0.1).			
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				<u>Hours</u>	Rate	Amount
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04/01/2021	HRW	BL	Call with J. Morris re: discovery in NPA demand note litigation (0.1); Draft discovery demands in NPA demand note litigation (1.0); Review adversary proceeding critical dates (0.6).	1,70	695.00	\$1,181.50
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04/02/2021	JNP	BL	Review witness list and reply brief regarding Committee's motion regarding Dondero discovery.	0.20	1295.00	\$259.00
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				Hours	Rate	Amount
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04/05/2021	HRW	BL	Review amended scheduling order for Dondero demand note proceeding (0.5).	0.50	695.00	\$347.50
04/06/2021	IDK	BL	E-mails with G Demo re Dondero withdrawal of reference motion and our prior research on jurisdiction issues re same	0.30	1325.00	\$397.50
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				Hours	Rate	Amount
04/07/2021	JAM	BL	Review Dondero's amended answer in notes litigation (0.1); draft document requests relating to Dondero's amended answer in notes litigation (0.3); draft interrogatories relating to Dondero's amended answer in notes litigation (0.3); draft requests for admission relating to Dondero's amended answer in notes litigation (0.3); e-mails to H. Winograd, J. Pomerantz, I. Kharasch, G. Demo re: discovery demands relating to Dondero's amended answer in notes litigation (0.2); review revised discovery requests (Winograd versions) relating to Dondero's amended answer in notes litigation (0.2); e-mail to B. Assink, C. Taylor, J. Pomerantz, G. Demo, H. Winograd re: discovery and timing of Dondero's deposition (0.1); e-mails to J. Seery, J. Pomerantz, I. Kharasch, G. Demo re: Dondero's amended answer and related discovery (0.2).	1.70	1245.00	\$2,116.50
04/07/2021	HRW	BL	Draft discovery demands for Dondero demand note adversary proceeding (0.9).	0.90	695.00	\$625.50
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				<u>Hours</u>	Rate	Amount
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04/08/2021	HRW	BL	Review demand note adversary proceeding complaints (0.3).	0.30	695.00	\$208.50
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04/09/2021	IDK	BL	E-mails with G Demo, others on Plan provisions re note collection/litigation issues	0.30	1325.00	\$397.50
04/09/2021	JMF	BL	Review notes receivable litigation and amounts due from noteholders re plan implementation (2.1)	2.10	1050.00	\$2,205.00
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04/09/2021	JAM	BL	Review of rules re: withdrawal of the reference (0.4); telephone conference with Z. Annable re: rules		1245.00	

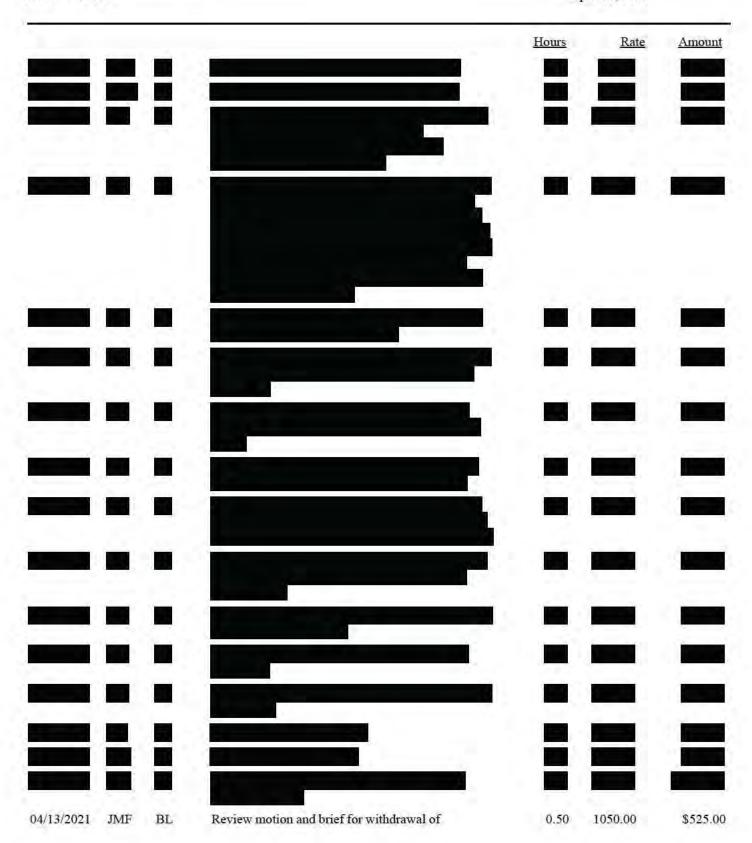
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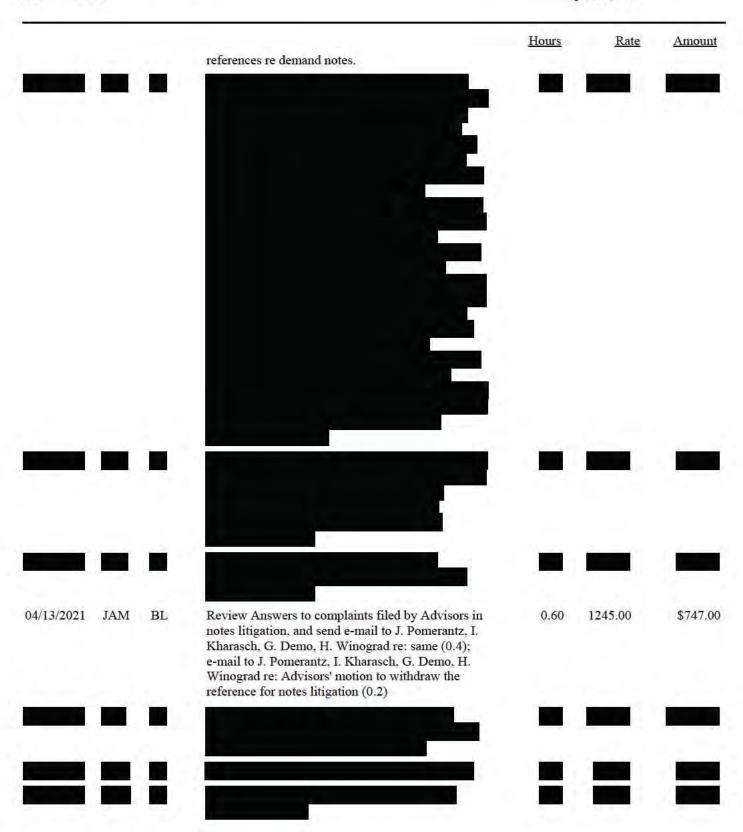
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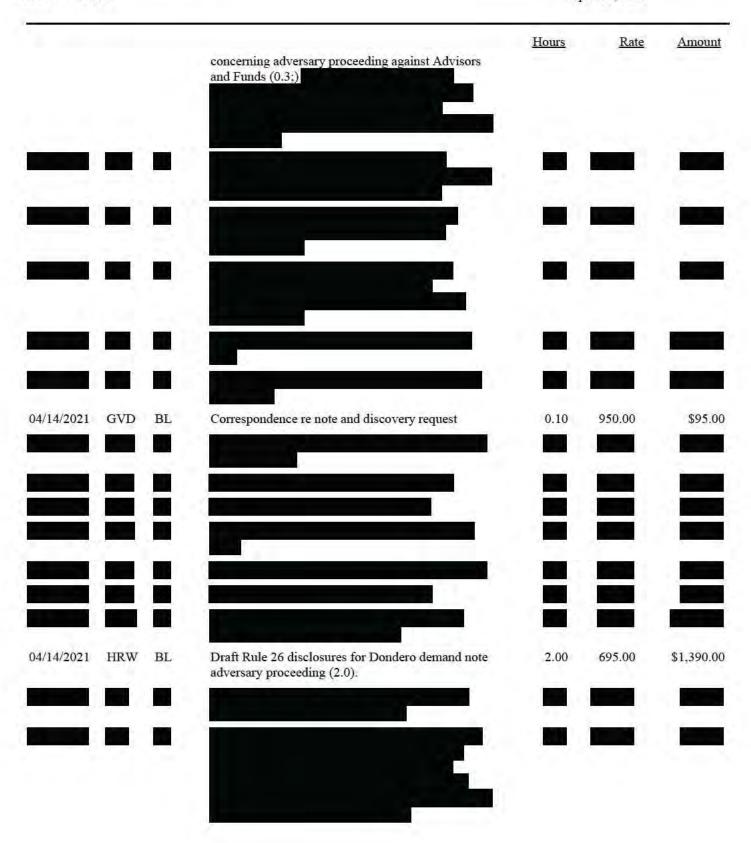


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				Hours	Rate	Amount
	222	424		2.72	723603	-2522.22
04/14/2021	JNP	BL	Email to D. Rukavina regarding scheduling for motion to withdraw reference.	0.10	1295.00	\$129.50
04/14/2021	JNP	BL	Email to and from D. Rukavina regarding hearing on motion to withdraw reference.	0.10	1295.00	\$129.50
04/14/2021	JNP	BL	Conference with John A. Morris regarding hearing on motion to withdraw reference.	0.10	1295.00	\$129.50
04/14/2021	JNP	BL	Review motion to withdraw reference.	0.20	1295.00	\$259.00
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04/14/2021	JAM	BL			1245.00	
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D. Rukavina, J. Pomerantz re: scheduling issues concerning adversary proceeding against Advisors and Funds (0.5); e-mail to Court, D. Rukavina, L. Hogewood, J. Pomerantz re: scheduling issues

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				Hours	Rate	Amount
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04/15/2021	HRW	BL	Prepare Rule 26 disclosures for Dondero demand note adversary proceeding (0.6).	0.60	695.00	\$417.00
04/16/2021	IDK	BL	E-mail and telephone conference with J Pomerantz re Dondero withdrawal of reference motions and logistics on response to same and J Kim (.2); E-mail and telephone conference with G Demo re same and relevant pleadings (.2); E-mails with J Kim re need for responses to Dondero withdrawal of reference motions (.2).	0.60	1325.00	\$795.00
04/16/2021	JJK	BL	Research re: reference withdrawal, core matter, Stern, related issues.	3.70	995.00	\$3,681.50
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				Hours	Rate	Amount
04/16/2021	JNP	BL	Conference with Ira D. Kharasch regarding motion to withdraw reference response.	0.20	1295.00	\$259.00
04/16/2021	JNP	BL	Review Dondero motion to stay pending withdrawal of the reference and email regarding same.	0.20	1295.00	\$259.00
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04/16/2021	GVD	BL	Review Dondero motion re withdrawal of the reference	0.20	950.00	\$190.00
04/16/2021	GVD	BL	Conference with I. Kharasch re motions to withdraw the reference and follow up items re same	0.20	950.00	\$190.00
	HRW	BL	Review Dondero withdrawal of reference filed in	0.50	695.00	\$347.50
04/16/2021	Inch		demand note adversary proceeding (0.5).			600000

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			adversary proceeding pending motion to withdraw	<u>Hours</u>	Rate	Amount
_			reference (0.3).			
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04/17/2021	JAM	BL	Review Dondero motion to expedite stay motion (0.3); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: analysis of Dondero motion to expedite stay motion (0.4); draft objection to Dondero motion to expedite motion for stay (2.7).	3.40	1245.00	\$4,233.00
04/17/2021	HRW	BL	Draft demand note discovery requests (2.5).	2.50	695.00	\$1,737.50
04/18/2021	JNP	BL	Review and comment on opposition to motion for stay of discovery and emails regarding same.	0.20	1295.00	\$259.00
04/18/2021	JAM	BL	Review and revise initial draft objection to Dondero's motion to expedite motion for stay (2.9); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: initial draft objection to Dondero's motion to expedite motion for stay (0.1); draft JAM declaration in support of objection to Dondero's motion to expedite motion for stay (0.5); e-mail to Z. Annable, G. Demo, H. Winograd re: declaration and objection concerning Dondero's motion to expedite (0.1).	3.60	1245.00	\$4,482.00
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04/18/2021	GVD	BL	Review objection to motion to expedite	0.30	950.00	\$285.00

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04/18/2021	HRW	BL	Draft demand note discovery requests (3.5).	3.50	695.00	\$2,432.50
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04/19/2021	JJK	BL	Research/analysis reference withdrawal, core matters, Stern issues.	7.80	995.00	\$7,761.00
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				<u>Hours</u>	Rate	Amount		
04/19/2021	HRW	BL	Draft discovery demands for HCMFA demand note proceeding (1.2).	1.20	695.00	\$834.00		
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04/20/2021	JJK	BL	Research/analysis of Stern, jurisdiction, reference, related issues.	3.10	995.00	\$3,084.50		
04/20/2021	JJК	BL	Analysis/research jurisdiction, Stern, reference issues.	4.30	995.00	\$4,278.50		
4/20/2021	JJK	BL	Research Stern, jurisdiction, reference, related issues.	3.10	995.00	\$3,084.50		
4/20/2021	JNP	BL	Conference with John A. Morris regarding funds/ advisor adversary proceeding and related.	0.20	1295.00	\$259.00		
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				Hours	Rate	Amount
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04/21/2021	JJК	BL	Research and prepare objection to NexPoint reference withdrawal motion.	2.10	995.00	\$2,089.50
04/21/2021	JJK	BL	Research and prepare objection to NexPoint/HCMFA reference motions.	5.40	995.00	\$5,373.00
04/21/2021	JJK	BL	Research/draft objection to HCMFA reference withdrawal motion.	3.00	995.00	\$2,985.00
04/21/2021	JNP	BL	Research regarding withdrawal reference and conference with Ira D. Kharasch and review of complaint and emails with Jeffrey H. Davidson regarding same.	0.40	1295.00	\$518.00

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			Hours	Rate	Amount
JJK	BL	Research re reference withdrawal issues.	0.80	995.00	\$796.0
JNP	BL	Review of memo regarding withdrawal of the reference.	0.20	1295.00	\$259.00
	JJK JNP	JNP BL	JNP BL Review of memo regarding withdrawal of the reference.	JJK BL Research re reference withdrawal issues. 0.80 JNP BL Review of memo regarding withdrawal of the reference.	JIK BL Research re reference withdrawal issues. 0.80 995.00 JNP BL Review of memo regarding withdrawal of the reference.

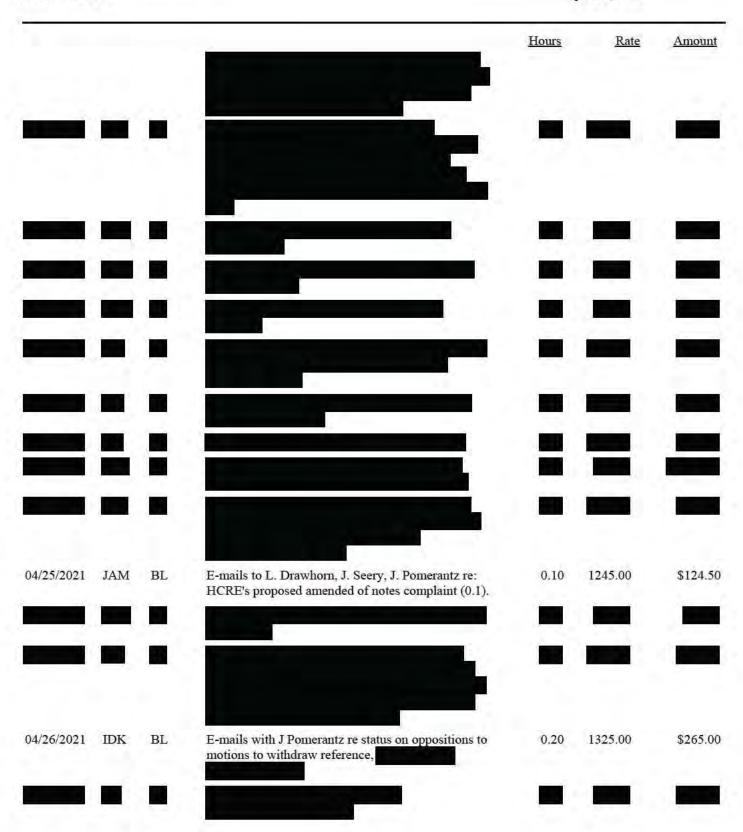
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LAF	BL	Legal research re: "Tax loan" & withdrawal of	<u>Hours</u> 0.50	Rate 475.00	<u>Amount</u> \$237.50
		reference.			-
JAM	BL	Review Dondero discovery requests (0.2); review Advisors' discovery requests (0.1); draft amended deposition notice for Dondero (0.1); e-mails with Z. Annable, H. Winograd re: amended deposition notice for Dondero (0.1).	0.50	1245.00	\$622.50
GVD	BL	Review Dondero discovery requests	0.20	950.00	\$190.00
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	JAM	JAM BL	JAM BL Review Dondero discovery requests (0.2); review Advisors' discovery requests (0.1); draft amended deposition notice for Dondero (0.1); e-mails with Z. Annable, H. Winograd re: amended deposition notice for Dondero (0.1).	JAM BL Review Dondero discovery requests (0.2); review Advisors' discovery requests (0.1); draft amended deposition notice for Dondero (0.1); e-mails with Z. Annable, H. Winograd re: amended deposition notice for Dondero (0.1).	JAM BL Review Dondero discovery requests (0.2); review Advisors' discovery requests (0.1); draft amended deposition notice for Dondero (0.1). Amable, H. Winograd re: amended deposition notice for Dondero (0.1).

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				Hours	Rate	Amount
04/26/2021	JJK	BL	Prepare objections to reference withdrawal motions of Dondero, NexPoint, HCMFA (separate adversary proceedings).	4.60	995.00	\$4,577.00
04/26/2021	JNP	BL	Conference with PSZJ team regarding pending litigation deadlines and responsibilities.	0.80	1295.00	\$1,036.00
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04/26/2021	JNP	BL	Review memo regarding withdrawal of reference and enforcement of reference.	0.10	1295.00	\$129.50
04/26/2021	JNP	BL	Review emails regarding Dondero discovery in notes litigation.	0.10	1295.00	\$129.50
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				Hours	Rate	Amount
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04/26/2021	HRW	BL	Call with G. Demo, J. Morris, B. Sharp, and meta e-discovery reps regarding responding to various discovery requests in adversary proceedings.	0.20	695.00	\$139.00
04/26/2021	HRW	BL	Review discovery demands in Notes Litigation.	1.00	695.00	\$695.00
04/26/2021	HRW	BL	Research summary judgement standard for notes litigation.	2.20	695.00	\$1,529.00

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1				Hours	Rate	Amount
04/27/2021	JJК	BL	Review docs and prepare objections to reference withdrawal motions of Dondero, NexPoint, HCMFA (separate adv. proceedings).	9.10	995.00	\$9,054.50
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04/28/2021 JJK BL Research/analysis re: Dondero claims and reference issues. 04/28/2021 JJK BL Work on withdrawal of reference response 2.50 995.00 \$2,487.50 04/28/2021 JNP BL Review email from M. Clemente regarding pending notes litigation and forward to Board.							
issues. Work on withdrawal of reference response 2.50 995.00 \$2,487.50 1.30 1295.00 \$129.50 1.30 1395.00 \$1,813.50 2.487.50 2.50 995.00 \$2,487.50 2.50 995.00 \$1,813.50					<u>Hours</u>	Rate	Amount
04/28/2021 JNP BL Review email from M. Clemente regarding pending notes litigation and forward to Board. 04/28/2021 RJF BL Review motion to amend, original complaint, related pleadings.	04/28/2021	JJK	BL		4.00	995.00	\$3,980.00
notes litigation and forward to Board. Day 2021 RJF BL Review motion to amend, original complaint, related pleadings. 1.30 1395.00 \$1,813.50 pleadings.	04/28/2021	JJK	BL	Work on withdrawal of reference response	2.50	995.00	\$2,487.50
notes litigation and forward to Board. D4/28/2021 RJF BL Review motion to amend, original complaint, related pleadings.							
notes litigation and forward to Board. D4/28/2021 RJF BL Review motion to amend, original complaint, related pleadings.							
notes litigation and forward to Board.							
pleadings.	4/28/2021	JNP	BL		0.10	1295.00	\$129.50
pleadings.							
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4/28/2021 JMF BL Review HCMFA answer. 0.30 1050.00 \$315.00	4/28/2021	RJF	BL		1.30	1395.00	\$1,813.50
04/28/2021 JMF BL Review HCMFA answer. 0.30 1050.00 \$315.00							
04/28/2021 JMF BL Review HCMFA answer. 0.30 1050.00 \$315.00							
FAI 20/2021 SMT BE REVIEW HEIVIFA answer.	14/28/2021	IME	RI	Review HCMEA answer	0.30	1050.00	\$315.00
	4/20/2021	31,11		Review Helvil 11 answer.	0.50	1050.00	ψ313.00
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				Hours	Rate	Amount
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04/28/2021	GVD	BL	Review response to motion to withdrawal the reference	0.50	950.00	\$475.00
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4/28/2021	HRW	BL	Review Dondero's responses to discovery requests in notes litigation.	0.10	695.00	\$69.5
4/28/2021	HRW	BL	Draft Responses and Objections for NPA discovery demands in notes litigation.	0.30	695.00	\$208.5

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				Hours	Rate	Amount
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04/29/2021	JAM	BL	Telephone conference with H. Winograd re: responses to Advisors' discovery requests in notes litigation (0.6).	0.60	1245.00	\$747.00
04/29/2021	JAM	BL	responses to Advisors' discovery requests in notes	0.60	1245.00	\$747.00
04/29/2021	JAM	BL	responses to Advisors' discovery requests in notes	0.60	1245.00	\$747,00
	JAM GVD	BL BL	responses to Advisors' discovery requests in notes	0.60	1245.00 950.00	Ξ
04/29/2021	=	•	responses to Advisors' discovery requests in notes litigation (0.6). Conference with DSI/HCMLP/H. Winograd re	=		\$285.00
04/29/2021 04/29/2021 04/29/2021	GVD	BL	responses to Advisors' discovery requests in notes litigation (0.6). Conference with DSI/HCMLP/H. Winograd re discovery	0.30	950.00	\$285.00 \$380.00 \$190.00

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04/29/2021 HRW BL Call with G. Demo regarding NPA discovery requests in notes litigation. 04/29/2021 HRW BL Call with G. Demo, K. Hendrix, D. Klos, J. Donahue regarding NPA discovery requests in notes litigation. 04/29/2021 HRW BL Draft responses & objections to NPA's discovery requests in notes litigation. 04/29/2021 HRW BL Call with J. Morris regarding NPA discovery in notes litigation. 04/29/2021 HRW BL Call with J. Morris regarding NPA discovery in notes litigation. 04/30/2021 IDK BL E-mails with J Kim re opposition to Advisors' and others motions to withdraw the reference (.6); Review of revised oppositions to same (.2).	
04/29/2021 HRW BL Call with G. Demo regarding NPA discovery requests in notes litigation. 04/29/2021 HRW BL Call with G. Demo, K. Hendrix, D. Klos, J. Donahue regarding NPA discovery requests in notes litigation. 04/29/2021 HRW BL Draft responses & objections to NPA's discovery 8.00 695.00 requests in notes litigation. 04/29/2021 HRW BL Call with J. Morris regarding NPA discovery in 0.60 695.00 notes litigation. 04/30/2021 IDK BL E-mails with J Kim re opposition to Advisors' and others motions to withdraw the reference (.6);	
04/29/2021 HRW BL Call with G. Demo regarding NPA discovery requests in notes litigation. 04/29/2021 HRW BL Call with G. Demo, K. Hendrix, D. Klos, J. Donahue regarding NPA discovery requests in notes litigation. 04/29/2021 HRW BL Draft responses & objections to NPA's discovery requests in notes litigation. 04/29/2021 HRW BL Call with J. Morris regarding NPA discovery in notes litigation. 04/29/2021 HRW BL Call with J. Morris regarding NPA discovery in notes litigation. 04/29/2021 IDK BL E-mails with J Kim re opposition to Advisors' and others motions to withdraw the reference (.6);	
04/29/2021 HRW BL Call with G. Demo regarding NPA discovery requests in notes litigation. 04/29/2021 HRW BL Call with G. Demo, K. Hendrix, D. Klos, J. Donahue regarding NPA discovery requests in notes litigation. 04/29/2021 HRW BL Draft responses & objections to NPA's discovery requests in notes litigation. 04/29/2021 HRW BL Call with J. Morris regarding NPA discovery in notes litigation. 04/29/2021 HRW BL Call with J. Morris regarding NPA discovery in notes litigation. 04/29/2021 IDK BL E-mails with J Kim re opposition to Advisors' and others motions to withdraw the reference (.6);	
requests in notes litigation. Call with G. Demo, K. Hendrix, D. Klos, J. Donahue regarding NPA discovery requests in notes litigation. Draft responses & objections to NPA's discovery requests in notes litigation. Call with J. Morris regarding NPA discovery in notes litigation. Call with J. Morris regarding NPA discovery in notes litigation. Call with J. Morris regarding NPA discovery in notes litigation. Call with J. Morris regarding NPA discovery in notes litigation. Call with J. Morris regarding NPA discovery in notes litigation. Call with J. Morris regarding NPA discovery in notes litigation. Call with J. Morris regarding NPA discovery in notes litigation. Call with J. Morris regarding NPA discovery in notes litigation.	
regarding NPA discovery requests in notes litigation. Draft responses & objections to NPA's discovery requests in notes litigation. Draft responses & objections to NPA's discovery requests in notes litigation. Call with J. Morris regarding NPA discovery in notes litigation. Description of the second of th	\$278.0
requests in notes litigation. O4/29/2021 HRW BL Call with J. Morris regarding NPA discovery in notes litigation. O4/30/2021 IDK BL E-mails with J Kim re opposition to Advisors' and others motions to withdraw the reference (.6);	\$208.5
notes litigation. 04/30/2021 IDK BL E-mails with J Kim re opposition to Advisors' and others motions to withdraw the reference (.6);	\$5,560.0
others motions to withdraw the reference (.6);	\$417.0
others motions to withdraw the reference (.6);	
Review of revised oppositions to same (.2).	\$1,060.0
04/30/2021 JJK BL Additional research for objections to withdrawal 3.60 995.00 reference motions of NexPoint, HCMFA, Dondero, and revise same objections.	\$3,582.0
04/30/2021 JJK BL Revise objections to reference withdrawal motions 2.10 995.00 and emails Kharasch on same.	\$2,089.5
04/30/2021 JMF BL Review motion to stay adversary proceedings. 0.40 1050.00	\$420.0

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04/30/2021	HRW	BL	Draft responses and objections to NPA's discovery requests in notes litigation.	3.50	695.00	\$2,432.50
04/30/2021	HRW	BL	Call with J. Morris regarding NPA discovery requests in notes litigation.	0.10	695.00	\$69.50
04/30/2021	HRW	BL	Call with D. Klos regarding NPA discovery requests in notes litigation.	0.60	695.00	\$417.00

Case 21-03006-sgj Doc 219 Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLinsein!** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLinsein!** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLinsein!** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLinsein!** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLinsein!** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLinsein!** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLinsein!** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLinsein!** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLinsein!** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLinsein!** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLinsein!** Filed 08/05/22 Entered 08/05

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd. 13th Floor Los Angeles, CA 90067

Board of Directors Highland Capital Management LP 300 Crescent Court ste. 700 Dallas, TX 75201 May 31, 2021 Invoice 127958 Client 36027 Matter 00002 JNP

RE: Postpetition

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2021



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				Hours	Rate	Amount
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05/01/2021	GVD	BL	Further revise motion to enforce the reference	4.30	950.00	\$4,085.00
05/02/2021	IDK	BL	Review of J Pomerantz comments to draft opposition to Advisors, others motions for withdrawal of reference.	0.30	1325.00	\$397.50
05/02/2021	JJK	BL	Analysis withdrawal issues; revise NexPoint/HCMFA oppositions.	4.30	995.00	\$4,278.50

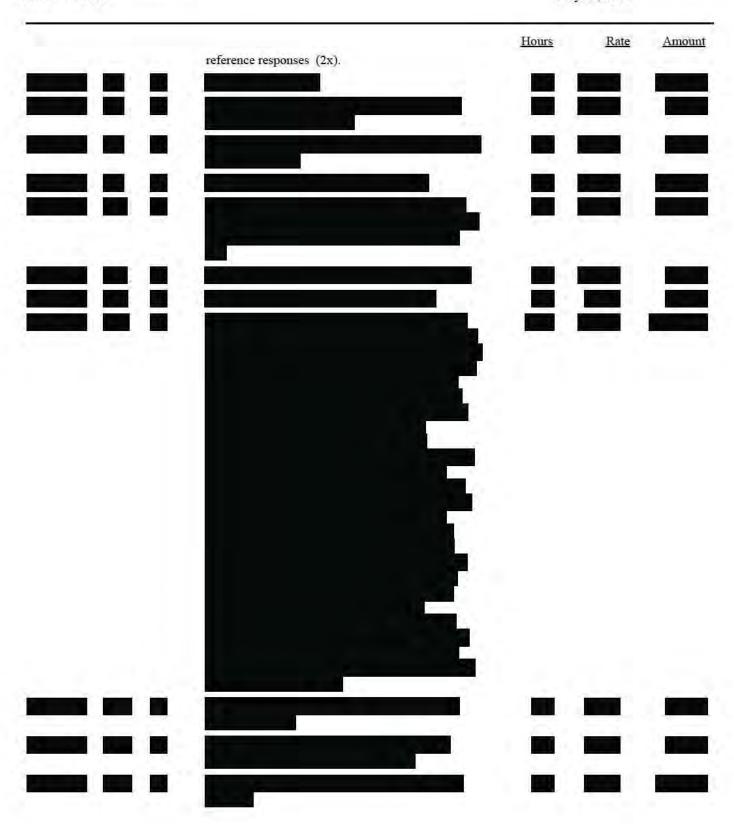
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			NextPoint motion to withdraw the reference, as well as feedback of others re same and consider (.5) Attend conference call with J Pomerantz, J Kim, G Demo re open issues on draft opposition to motions to withdraw reference (.3); Review of further revised draft of opposition to same (.2); Attend next conference call re same on next draft of opposition	Hours	Rate	Amount
05/03/2021	JJK	BL	(.4). Emails Pomerantz, Demo re: opp to NexPoint/HCMFA withdrawal reference motions; research/analysis/revisions to same.	2.40	995.00	\$2,388.00
05/03/2021	JJK	BL	Prepare opp to HCMFA withdrawal reference motion and analysis for same.	2.70	995.00	\$2,686.50
05/03/2021	JJK	BL	Analysis/revise oppositions to NexPoint and HCMFA reference motions.	3.70	995.00	\$3,681.50
05/03/2021	JJK	BL	Research/analysis re: reference withdrawal matters.	1.00	995.00	\$995.00
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05/03/2021	JNP	BL	Brief review of motion to enforce reference.	1.00	1295.00	\$1,295.00
05/03/2021	JNP	BL	Conference with Robert J. Feinstein regarding motion to enforce reference and related litigation matters.	0.30	1295.00	\$388.50
05/03/2021	JNP	BL	Conference with Robert J. Feinstein and Gregory V. Demo regarding motion to enforce reference.	0.20	1295.00	\$259.00
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05/03/2021	JNP	BL	Review revised motion to withdraw reference response.	0.30	1295.00	\$388.50
05/03/2021	JNP	BL	Conference with Jonathan J. Kim, Ira D. Kharasch and Gregory V. Demo regarding motion to withdraw	0.60	1295.00	\$777.00

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				<u>Hours</u>	Rate	Amount
05/03/2021	GVD	BL	Revise and serve demand letter re Dugaboy note	0.30	950.00	\$285.00
05/03/2021	GVD	BL	Revise and serve demand letter re Hunter Mountain note	0.30	950.00	\$285.00
05/03/2021	GVD	BL	Conference with PSZJ team re response to withdrawal of reference in NPA notes litigation	0.40	950.00	\$380.00
05/03/2021	GVD	BL	Review and revise response to motion to enforce the reference in NPA notes litigation	1.20	950.00	\$1,140.00
05/03/2021	GVD	BL	Follow up conference with PSZJ re opposition to motion to withdraw the reference in NPA litigation	0.30	950.00	\$285.00
05/03/2021	GVD	BL	Conference with J. Morris re status of notes litigation	0.20	950.00	\$190.00
05/04/2021	IDK	BL	Review of J Kim's next version of opposition to NextPoint motion to withdraw reference (.3); E-mails with J Kim re my proposed changes to same, as well as comments/questions from J Pomerantz re same and J Kim response (.5); Review of final revised opposition to same and green light to file (.2).	1.00	1325.00	\$1,325.00
05/04/2021	JJK	BL	Emails Demo, Morris, Pomerantz on withdrawal reference pleadings issues; research/revise oppositions to reference withdrawal motions.	2.20	995.00	\$2,189.00

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05/04/2021	JJK	BL	Emails Demo on withdrawal reference pleadings issues; research/revise oppositions to reference withdrawal motions.	3.90	995.00	\$3,880.50
05/04/2021	JNP	BL	Review and comment on latest version on motion to withdraw reference.	0.20	1295.00	\$259.00
05/04/2021	RJF	BL	Review and revise motion to enforce the reference.	1.30	1395.00	\$1,813.50
03/04/2021			review and revise motion to emore the reference.	1.50	1393.00	\$1,015.50
05/04/2021	JAM	BL	Review draft opposition to withdraw the reference (NexPoint) (0.4).	0.40	1245.00	\$498.00

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05/04/2021	HRW	BL	Call with DSI regarding NPA document production for demand note proceeding.	0.50	695.00	\$347.50
05/04/2021	HRW	BL	Call with R. Half and J. Morris regarding NPA document production in demand note litigation.	0.20	695.00	\$139.00
05/04/2021	HRW	BL	Prepare for call with R. Half and J. Morris regarding NPA document production in demand note litigation.	1.20	695.00	\$834.00
05/04/2021	HRW	BL	Review J. Seery comments to NPA R&O's in	0.30	695.00	\$208.50

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				Hours	Rate	Amount
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05/05/2021	HRW	BL	Prepare interrogatory verification for R&Os to NPA interrogatories in notes litigation (0.2); Review Seery's comments to R&Os to NPA discovery demands in notes litigation (0.1); Review DSI documents for production for NPA discovery demands in notes litigation (0.2).	0.50	695.00	\$347.50
05/06/2021	IDK	BL	Review of updated opposition to Dondero motion to withdraw reference (.3); E-mails with J Kim re same and further issues on mandatory withdrawal of reference and related memo on same (.3); Telephone conference with J Pomerantz re same (.1); E-mails with J Kim re status and ok to file (.1).	0.80	1325.00	\$1,060.00
05/06/2021	IDK	BL	E-mails with J Kim re mistake made in filed opposition today to Dondero motion to withdraw ref, and how to fix, including feedback of J Pomerantz re same.	0.40	1325.00	\$530.00
05/06/2021	JJK	BL	Emails Kharasch on withdrawal reference objections, and revise same and prepare supplement	4.20	995.00	\$4,179.00

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05/06/2021	HRW	BL	Communicate with R. Half re: NPA production in demand note proceeding (0.9); Call with L. Canty re: NPA production in notes litigation (0.1); Review critical dates re: Dondero stay motion and motion to withdraw reference in notes litigation (0.2); Prepare search terms for NPA production in notes litigation (0.3).	1.50	695.00	\$1,042.50
05/07/2021	IDK	BL	Review of draft addendum to prior filed opposition to Dondero motion to withdraw ref and consider changes (.2); E-mails with J Kim and J Pomerantz re same, as well as feedback of local counsel (.3).	0.50	1325.00	\$662.50
05/07/2021	JJK	BL	Two conf. calls (2x 0.3) with Pomerantz, Kharasch, Demo on reference withdrawal oppositions.	0.60	995.00	\$597.00

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05/07/2021	HRW	BL	Review discovery requests in notes litigation (2.0); Edit R&O's for NPA discovery requests (0.3).	2.30	695.00	\$1,598.50
05/08/2021	RJF	BL	Review and revise motion to enforce.	0.80	1395.00	\$1,116.00
05/08/2021	JAM	BL	Review/revise document requests, interrogatories, and requests for admission relating to HCMS notes	1.30	1245.00	\$1,618.50
_			litigation (1.1); e-mails with J. Pomerantz, H. Winograd re: revisions to discovery requests for HCMS notes litigation (0.2).			
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05/08/2021	HRW	BL	Draft discovery demands for notes litigation (3.5); Review discovery requests to Debtor in notes litigation (1.2).	4.70	695.00	\$3,266.5
5/09/2021	HRW	BL	Review discovery requests to Debtor in notes litigation (2.5); Prepare search terms for document production in notes litigation (1.0).	3.50	695.00	\$2,432
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05/10/2021	HRW	BL	Draft and review discovery search criteria for NPA production in demand note proceeding (3.6); Draft responses and objections to Dondero discovery	5.00	695.00	\$3,475.00
			demands in notes litigation (0.8); Draft and prepare discovery demands in HCMS notes litigation (0.6).			
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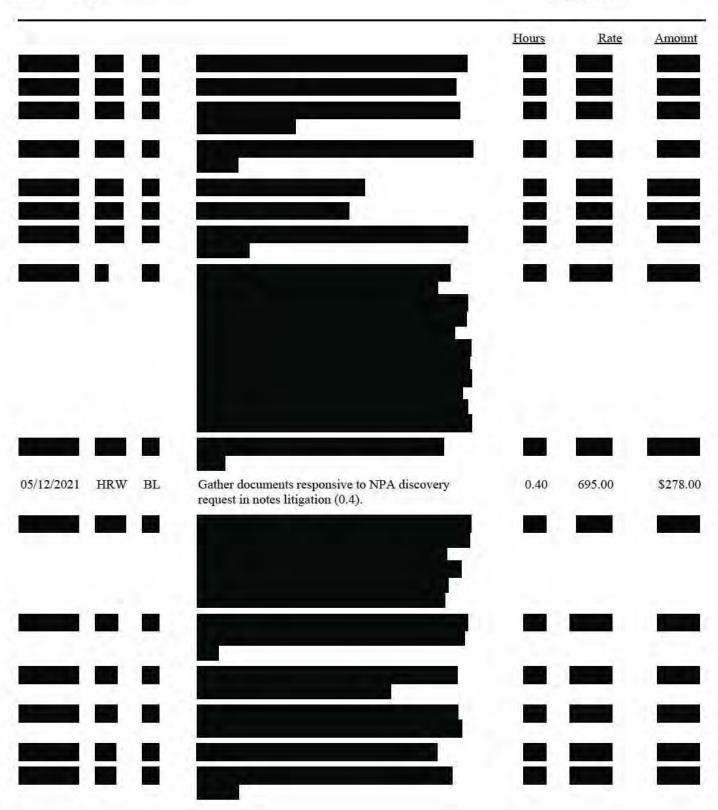
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05/11/2021	JAM	BL	E-mails with B. Assink re: discovery on Dondero notes litigation (0.3); telephone conference with J. Seery, D. Klos re: Dondero notes litigation (0.4); e-mail to B. Assink, J. Bonds, J. Pomerantz, G. Demo, H. Winograd re: depositions (0.4).	1.10	1245.00	\$1,369.50
05/11/2021	LSC	BL	Assist with preparation of responses and objections	0.60	460.00	\$276.00
			to discovery requests in NexPoint notes litigation.			

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				Hours	Rate	Amount
05/11/2021	GVD	BL	Conference with counsel to Hunter Mountain re note demand and follow up re same	0.30	950.00	\$285.00
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05/11/2021	HRW	BL	Draft search terms for document production for NPA	1.90	695.00	\$1,320.50
			notes litigation (1.3); Communicate with R. Half re: document production for NPA notes litigation (0.6).			
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05/17/2021	JAM	BL	Review/revise objection to Dondero motion to compel (2.0); e-mails with J. Pomerantz, G. Demo, H. Winograd, Z. Annable re: draft objection to Dondero motion to compel (0.2); draft JAM declaration in support of Debtor's objection to Dondero motion to compel (0.7); e-mails with G. Demo, H. Winograd, L. Canty, Z. Annable re: exhibits to JAM declaration (0.2).	3.10	1245.00	\$3,859.50
05/17/2021	LSC	BL	Conduct research in connection with motion to withdraw the reference for G. Demo.	0.60	460.00	\$276.00
05/17/2021	LSC	BL	Assist with preparation of exhibits in connection with Debtor's Objection to Motion to Compel Deposition Testimony of James P. Seery, Jr.	0.40	460.00	\$184.00
05/17/2021	GVD	BL	Review response to motion to compel	0.30	950.00	\$285.00
05/17/2021	GVD	BL	Prepare for argument on motions to withdraw the reference	0.80	950.00	\$760.00
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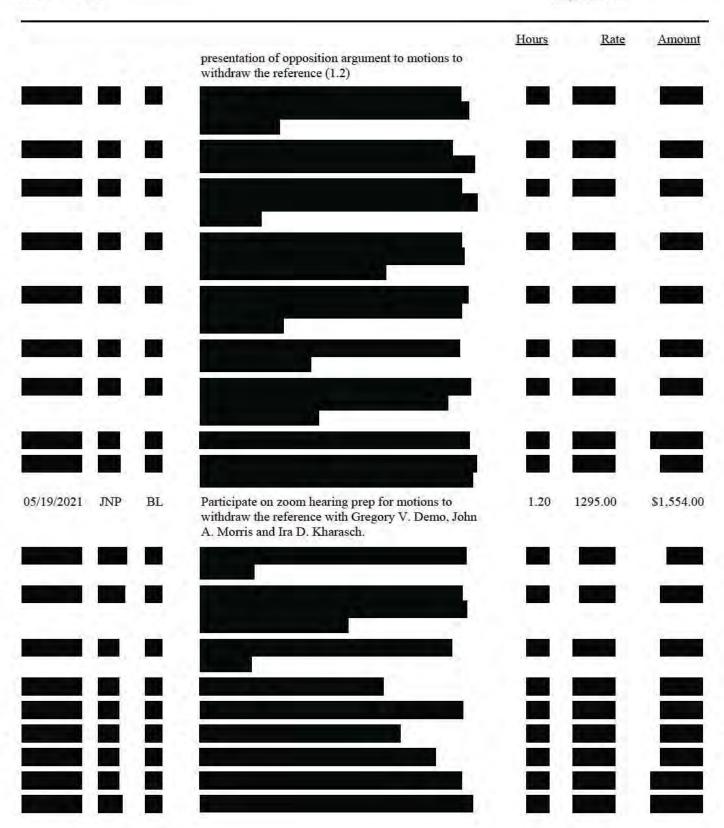
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				Hours	Rate	Amount
	- 202	422	preparation for hearing.		2020.00	05020
05/18/2021	JNP	BL	Review reply regarding motion to withdraw reference.	0.10	1295.00	\$129.5
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5/18/2021	JMF	BL	Review response re discovery motion to compel testimony re demand notes.	0.30	1050.00	\$315.0
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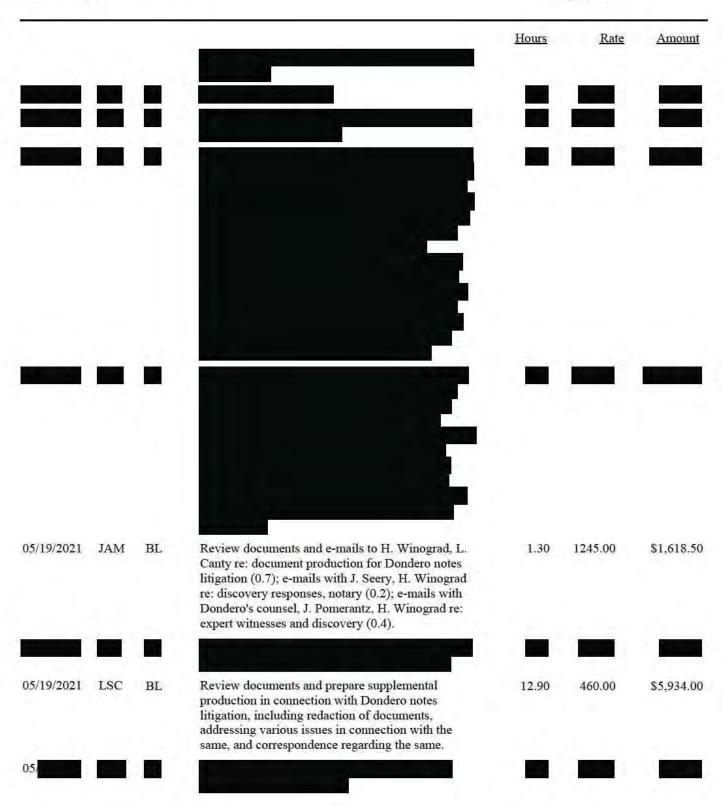
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				Hours	Rate	Amount
05/19/2021	GVD	BL	Attend conference with PSZJ working team re preparation for argument on motion to withdraw reference	1.20	950.00	\$1,140.0
5/19/2021	GVD	BL	Prepare for argument on motion to withdraw the reference	3.10	950.00	\$2,945.0
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5/19/2021	HRW	BL	Send amended discovery R&Os to opposing counsel for NPA requests in notes litigation (0.1); Call with J. Morris and C. Mackle re: document production to Dondero's first Set of requests in notes litigation (0.3); Send production to Dondero's counsel in response to first set of requests in notes litigation (0.1).	0.50	695.00	\$347.5
5/19/2021	HRW	BL	Prepare and review document production to Dondero's first Set of requests in notes litigation (2.2).	2.20	695.00	\$1,529.0
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				Hours	Rate	Amount
05/20/2021	JNP	BL	Participate in hearing on motion to compel J. Seery testimony.	1.10	1295.00	\$1,424.50
05/20/2021	JNP	BL	Emails to and from J. Seery and Gregory V. Demo regarding Latham communications with DSI.	0.10	1295.00	\$129.50
05/20/2021	JNP	BL	Emails to and from John A. Morris regarding U. S. Trustee inquiry.	0.10	1295.00	\$129.50
05/20/2021	JAM	BL	Preparing for hearing on Dondero's motion to compel (0.3); court conference on Dondero's motion	1.40	1245.00	\$1,743.00
			to compel (1.1).			-
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05/20/2021	GVD	BL	Attend hearing re motion to compel	1.10	950.00	\$1,045.00
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				Hours	Rate	Amount
05/20/2021	JE	BL	Work on reply brief (11.0); review motion to amend complaint (.4); call with Mr. Morris regarding briefing (.3); research judgment issues (1.4).	13.10	1195.00	\$15,654.5
05/21/2021	JMF	BL	Review replies re contempt and reference withdrawal motions.	0.40	1050.00	\$420.0
05/21/2021	JAM	BL	Finalize responses and objections to Dondero's second set of document requests (0.1); e-mail to Dondero's counsel re: R&Os to second set of	0.20	1245.00	\$249.0
			document requests (0.1).			
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05/21/2021	GVD	BL	Prepare witness and exhibit list re notes litigation	0.60	950.00	\$570.0

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				<u>Hours</u>	Rate	Amount
05/22/2021	JNP	BL	Review motion to compel testimony of former employees.	0.20	1295.00	\$259.00
05/22/2021	GVD	BL	Conference with J. Morris, J. Seery, and HCMLP	1.10	950.00	\$1,045.00
			team re HCMFA affirmative defense			
05/22/2021	GVD	BL	Review motions for leave to amend	0.20	950.00	\$190.00
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05/22/2021	HRW	BL	Review HCMFA motion to amend answer (0.5).	0.50	695.00	\$347.50
05/23/2021	JNP	BL	Emails to and from D. Rukavina regarding Sauter subpoena in connection with reference motion.	0.20	1295.00	\$259.00

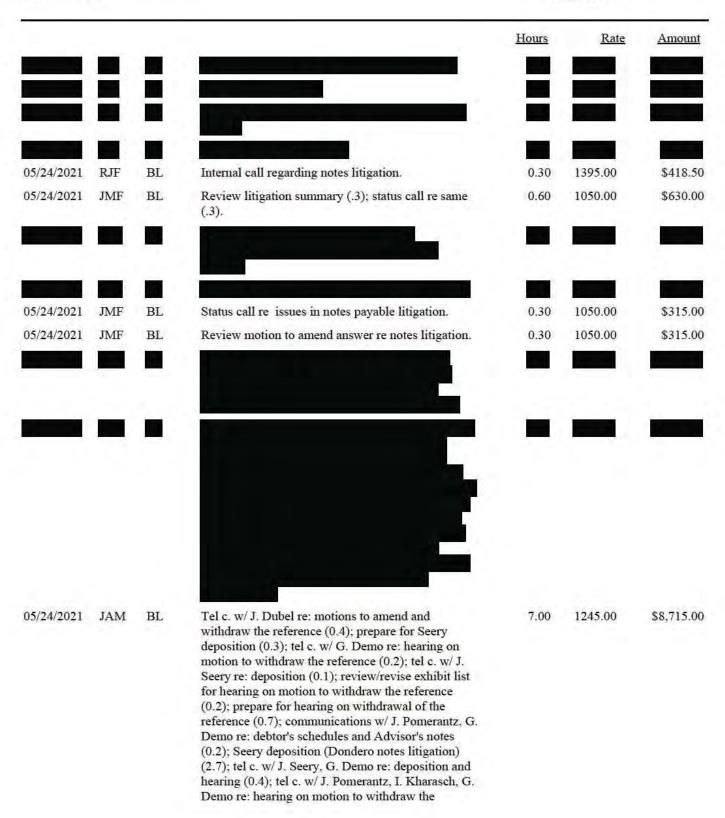
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				Hours	Rate	Amount
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05/23/2021	JAM	BL	Prepare Subpoena for DC Sauter (notes litigation) for hearing on motion to withdraw reference (0.3); e-mail to J. Seery, T. Surgent, D. Klos, J. Pomerantz, G. Demo, H. Winograd re: strategy, hearing on motion to withdraw reference (0.3); telephone conference with J. Seery, G, Demo re: prepare for deposition (Dondero notes litigation) (1.1); e-mail to H. Winograd, J. Pomerantz, I. Kharasch, G. Demo re: motion for summary judgment, opposition to motions to amend (0.7); communications with G. Demo re: potential exhibits for amended W&E list (0.2); e-mails with B. Levine re: Dondero summary judgment motion (0.1); telephone conference with H. Winograd re: Dondero summary judgment motion (0.1); telephone conference with G. Demo re: documents/exhibit list/facts re: motion to withdraw the reference (1.1); revise Sauter subpoena (0.1); e-mails with Z. Annable re: Sauter subpoena (0.3); amend Sauter subpoena (0.1); e-mails with D.	4.70	1245.00	\$5,851.50
05/23/2021	LSC	BL	Rukavina, J. Pomerantz re: Sauter subpoena (0.3). Preparation of amended exhibit lists (3) and exhibits for 5/25/21 hearing, including redactions to certain	5.60	460.00	\$2,576.00
05/23/2021	GVD	BL	exhibits. Conference with J. Morris re motion to withdraw reference	0.10	950.00	\$95.00
05/23/2021	GVD	BL	Conference with J. Seery and J. Morris re depo prep for notes litigation	1.20	950.00	\$1,140.00
05/23/2021	GVD	BL	Conference with J. Morris re evidentiary issues for motion to withdraw the reference	1.10	950.00	\$1,045.00
05/23/2021	GVD	BL	Prepare for hearing on motion to withdraw the	2.90	950.00	\$2,755.00

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				Hours	Rate	Amount
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05/24/2021	IDK	BL	Attend conference call re notes collection issues (.3).	0.30	1325.00	\$397.50
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05/24/2021	JNP	BL	Review and comment on Gregory V. Demo outline on motion to withdraw reference argument.	0.50	1295.00	\$647.50
05/24/2021	JNP	BL	Conference with Gregory V. Demo, Ira D. Kharasch and John A. Morris regarding hearing on motion to withdraw reference.	0.60	1295.00	\$777.00
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05/24/2021	JNP	BL	Conference with PSZJ team regarding update on notes litigation.	0.30	1295.00	\$388.50
05/24/2021	JNP	BL	Conference with John A. Morris regarding proposal regarding depositions in notes litigation.	0.10	1295.00	\$129.50

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0				Hours	Rate	Amount
			reference (0.6); tel c. w/ J. Pomerantz re: hearing (0.2); tel c. w/ J. Pomerantz re: e-mails with D. Rukavina concerning motion to amend/motion to withdraw reference (0.1); e-mails w/ D. Rukavina, J. Pomerantz re: motion to amend/Sauter subpoena/motion to withdraw the reference (0.4); e-mail to J. Seery re: deposition transcript (0.1); e-mail to J. Seery, J. Pomerantz, G. Demo, H. Winograd re: Klos deposition (0.1); e-mails w/ M. Aigen, J. Seery, T. Surgent, D. Klos re: discovery in Dondero notes litigation (0.3)			
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05/24/2021	GVD	BL	Prepare for hearing on motion to withdraw the reference	5.80	950.00	\$5,510.00
05/24/2021	GVD	BL	Attend deposition of J. Seery re Dondero note litigation	2.60	950.00	\$2,470.00
05/24/2021	GVD	BL	Conference with J. Seery and J. Morris re follow up to Seery deposition	0.30	950.00	\$285.00
05/24/2021	GVD	BL	Conference with PSZJ re status of note litigation and motion to withdraw the reference	0.60	950.00	\$570.00
05/24/2021	GVD	BL	Attend PSZJ status conference on notes litigation	0.30	950.00	\$285.00
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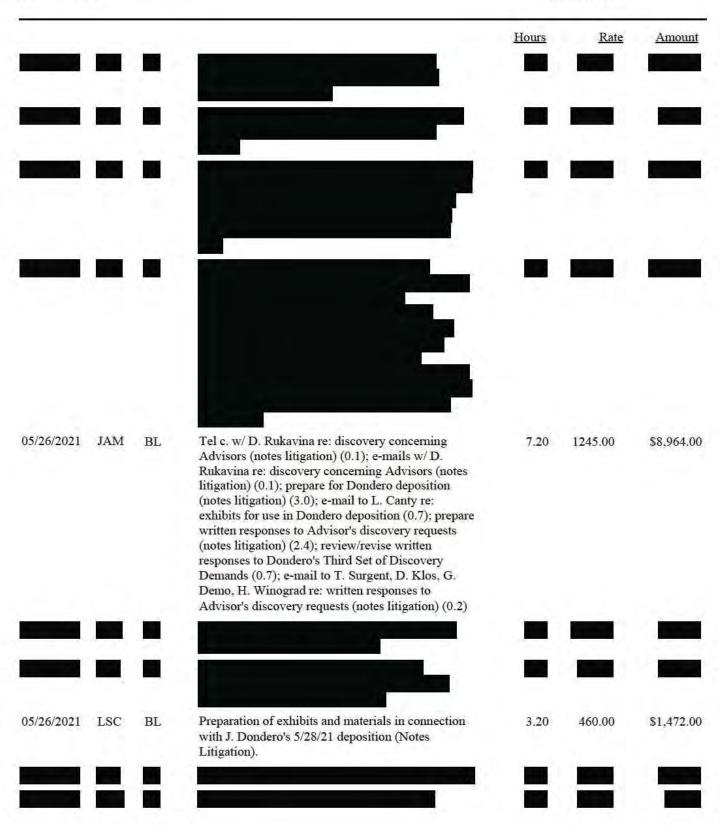
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				<u>Hours</u>	Rate	Amount
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05/25/2021	JAM	BL	Prepare Notice of Service of Subpoena (NexBank) (0.2); e-mail to Z. Annable, G. Demo, H. Winograd re: Notice of Service of Subpoena (NexBank) (0.1); prepare Notice of Service of Subpoena (Advisors) (0.1); e-mail to Z. Annable, G. Demo, H. Winograd re: Notice of Service of Subpoena (Advisors) (0.1); meet and confer call w/ L. Phillips, M. Sbaiti re: document requests (0.5)	1,00	1245.00	\$1,245.00
05/25/2021	JAM	BL	Tel c. w/ G. Demo re: withdrawal of the reference hearing (0.1); prepare for withdrawal of the reference hearing (0.4); work on summary judgment against Dondero (notes litigation) (0.7); hearing on withdrawal of the reference (2.2); tel c. w/ J. Pomerantz re: hearing (0.1); tel c. w/ J. Seery, J. Dubel, J. Pomerantz, G. Demo re: hearing (0.4); telc . w/ G. Demo re: hearing, document production and related matters (0.3); e-mails w/ D. Klos, G. Demo re: document production (0.2); e-mails to L Canty re: document production (Dondero notes litigation) (0.3); e-mails to Dondero's counsel re: document production (0.1)	4.80	1245.00	\$5,976.00
05/25/2021	LSC	BL	Prepare for and assist at hearing on motions to stay and status conference re motion to withdraw the reference.	2.30	460.00	\$1,058.00

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				Hours	Rate	Amount
05/25/2021	LSC	BL	Preparation of supplemental production to Dondero.	2.00	460.00	\$920.00
05/25/2021	GVD	BL	Prepare for evidentiary hearing on motion to withdraw reference	3.80	950.00	\$3,610.00
05/25/2021	GVD	BL	Attend hearing on motions to withdraw the reference	2.10	950.00	\$1,995.00
05/25/2021	GVD	BL	Conference with team re follow up to hearing on motion to withdraw the reference	0.50	950.00	\$475.00
05/25/2021	GVD	BL	Conference with J. Morris on evidentiary hearing on motion to withdraw	0.30	950.00	\$285.00
05/25/2021	GVD	BL	Conference with J. Romey re status of note litigation	0.20	950.00	\$190.00
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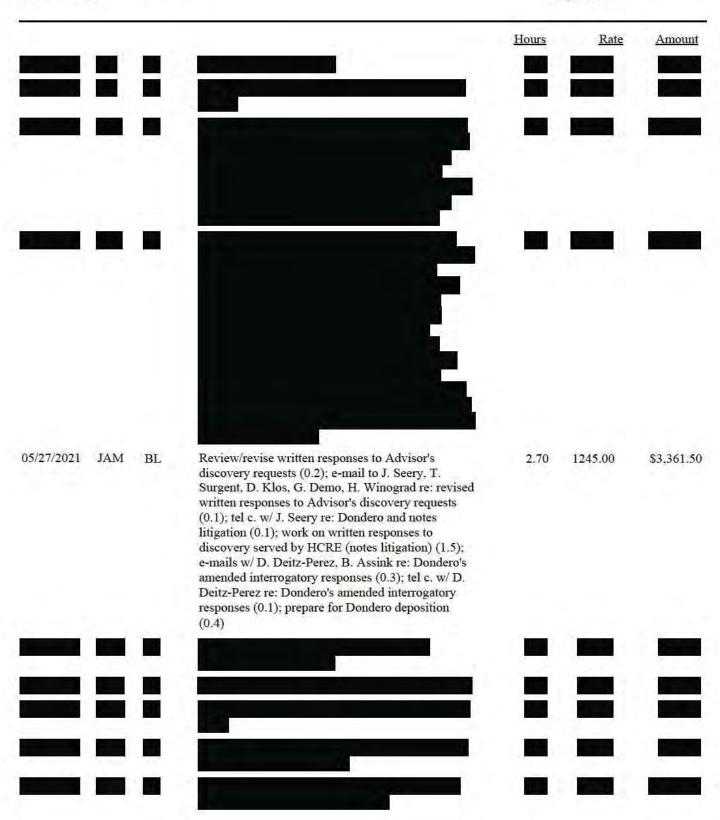
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05/26/2021 HRW BL Review production for NPA discovery requests in notes litigation (0.3)		5.00	
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	.50 02.	3.00	\$208.50
05/27/2021 JNP BL Conference with John A. Morris regarding Dondero amended answer and discovery issues.	20 129	5.00	\$259.00
amended answer and discovery issues.			

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				Hours	Rate	Amount
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05/28/2021	JNP	BL	Conference with John A. Morris regarding Dondero deposition on note litigation.	0.10	1295.00	\$129.50
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05/28/2021	JAM	BL	Prepare for Dondero deposition (3.5); Dondero deposition (4.6); tel c. w/ J. Pomerantz re: Dondero deposition (0.1); tel c. w/ J. Seery re: Dondero deposition (0.3); e-mails w/ J. Seery, H. Winograd re: written responses to Advisor's discovery requests (0.2); e-mail to Bonds Ellis, J. Pomerantz, G. Demo, H. Winograd re: proposed order on stay (0.1)	8,80	1245.00	\$10,956.00
05/28/2021	LSC	BL	Preparation for and assist at deposition of Jim Dondero (notes litigation)	5.50	460.00	\$2,530.00
			2 2 2 2			
05/28/2021	GVD	BL	Conference with J. Morris and J. Seery re Dondero deposition and next steps	0.20	950.00	\$190.00
05/28/2021	GVD	BL	Attend Dondero Deposition (partial)	1.60	950.00	\$1,520.00

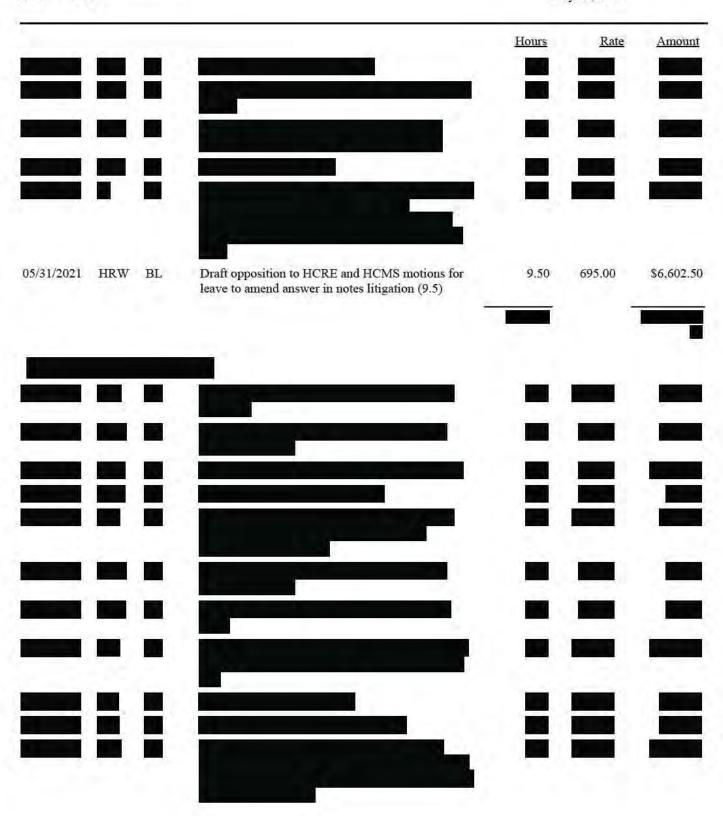
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CMFA 0.40	695.00	\$278.00
with notes 3.50	695.00	\$2,432.50
requests in 0.30	695.00	\$208.50
ndero written B. Assink, C. nograd re:	1245.00	\$747.00
G. Demo, H. t for t report (0.3); Winograd re: tten ts, sion (3.1); aft written ts, sion (0.1); tel CRE/Services	1245.00	\$5,478.00
	requests in 0.30 requests in 0.30 ms for 0.60 mdero written B. Assink, C. mograd re: rry (0.2) liscovery 4.40 G. Demo, H. t for t report (0.3); Winograd re: tten ts, sion (3.1); aft written ts, sion (0.1); tel CRE/Services uplaint and	requests in 0.30 695.00 requests in 0.30 695.00 ms for 0.60 1245.00 ms for 0.60 1245.00 ms for 0.60 1245.00 strongrad re: rry (0.2) discovery 4.40 1245.00 for t report (0.3); Winograd re: tten ts, sion (3.1); aft written ts, sion (0.1); tel CRE/Services uplaint and

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				<u>Hours</u>	Rate	Amount
05/29/2021	HRW	BL	Draft opposition to HCRE and HCMS motions for leave to amend answer in notes litigation (2.0)	2.00	695.00	\$1,390.00
05/29/2021	HRW	BL	Call with J. Morris re: opposition to HCRE and HCMS motions for leave to amend answer in notes litigation (0.3)	0.30	695.00	\$208.50
05/30/2021	JAM	BL	Review documents (1.9); tel c. w/ G. Demo re: document review/facts (1.1); e-mails w/ G. Demo re: facts (0.3); tel c. w/ G. Demo re: document review/facts (0.6); prepare for depositions (0.8)	4.70	1245.00	\$5,851.50
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05/30/2021	GVD	BL	Conference with J. Morris re deposition preparation	0.60	950.00	\$570.00
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05/30/2021	HRW	BL	Draft opposition to HCRE and HCMS motions for leave to amend answer in notes litigation (3.5)	3.50	695.00	\$2,432.50
05/31/2021	JAM	BL	Analyze G. Scott prior deposition transcript (2.4); analysis of use of Scott transcript, and e-mail to J. Pomerantz, G. Demo, H. Winograd concerning the same (0.6); prepare for Dondero and Scott depositions (6.4); e-mails w/ L. Canty re: deposition exhibits (0.2); tel c. w/ G. Demo, C. Wilkins re: potential conflicts (0.2);		1245.00	
05/31/2021	JAM	BL	Review/revise discovery requests for HCRE (notes litigation (0.4); e-mail to L. Drawhorn, G. Demo, H. Winograd, J. Rudd re: discovery requests for HCRE (notes litigation) (0.1); tel c. w/ H. Winograd re:	0.70	1245.00	\$871.50

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Case 21-03006-sgj Doc 219 Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLingent** Filed 08/05/22 Entered 08/05/22 21:11:43 Desc Main Case 3:21-cv-00881-X Docum**ProtcLingent** Filed 08/05/22 Entered 08/05/22 Entered

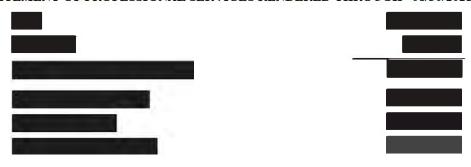
Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd. 13th Floor Los Angeles, CA 90067

Board of Directors Highland Capital Management LP 300 Crescent Court ste. 700 Dallas, TX 75201 June 30, 2021
Invoice 128195
Client 36027
Matter 00002
JNP

RE: Postpetition

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 06/30/2021



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				<u>Hours</u>	Rate	Amount
			Demo, H. Winograd re: comments to draft objection to HCMS motion for leave to amend answer (0.1); tel c. w/ J. Dubel re: expert report (0.1); tel c. w/ H. Winograd re: objections to HCRE and HCMS motions for leave to amend answer (0.1); review/revise objections to HCRE and HCMS motions for leave to amend answer (0.2); e-mails w/ G. Demo, H. Winograd, D. Klos, K. Hendrix, J. Donohue re: partial payment/performance by HCRE and HCMS (0.1); communications w/ H. Winograd, Z. Annable re: finalizing and filing objections to HCRE and HCMS motions for leave to amend answer (0.2)			
06/01/2021	LSC	BL	Draft declarations in support of oppositions to HCMS and HCRE motions to amend (1.1); assist with revising and finalizing of oppositions to HCMS and HCRE motions to amend (1.3); revise and finalize exhibits (.5).	2.90	460.00	\$1,334.00
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06/01/2021	GVD	BL	Review and revise motion for leave to amend HCRE and HCMS answers	2.00	950.00	\$1,900.00
06/01/2021	HRW	BL	Draft opposition to HCRE and HCMS motions for leave to amend answer in notes litigation (12.5)	12.50	695.00	\$8,687.50
06/02/2021	JMF	BL	Review responses to motions for leave to amend answer.	0.40	1050.00	\$420.00

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				<u>Hours</u>	Rate	Amount
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06/02/2021	HRW	BL	Review documents produced in Dondero notes litigation (0.1)	0.10	695.00	\$69.50
06/03/2021	JAM	BL	E-mail to L. Drawhorn, J. Rudd, J. Pomerantz, G. Demo re: motion to withdraw the reference and related matters (0.3); e-mails w/ M. Aigen, Dondero's other counsel, J. Pomerantz, G. Demo, H. Winograd re: scheduling of expert depositions (0.1); prepare notices of deposition for Nancy Dondero and Dondero's expert witnesses and send to Z. Annable, H. Winograd (0.2); review HCRE/HCMS motions (0.3)	0.90	1245.00	\$1,120.50
06/03/2021	LSC	BL	Review documents, redact, and prepare NexPoint document production (and address numerous issues with).	8.20	460.00	\$3,772.00
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6/03/2021	GVD	BL	Correspondence with J. Donohue re demand letters on notes	0.20	950.00	\$190.00
06/03/2021	GVD	BL	Correspondence with J. Morris re HCRE/HCMS motions for leave to amend	0.20	950. <mark>0</mark> 0	\$190.00

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				Hours	Rate	Amoun
06/03/2021	GVD	BL	Correspondence with J. Morris and H. Winograd re status of notes litigation	0.20	950.00	\$190.0
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6/03/2021	HRW	BL	Prepare document production for NexPoint discovery in connection with notes litigation (1.0)	1.00	695.00	\$695.0
6/03/2021	HRW	BL	Call with L. Canty re: document production for NexPoint discovery in connection with notes litigation (0.2)	0.20	695.00	\$139.0
6/03/2021	HRW	BL	Draft responses and objections to document requests in HCMS notes litigation (1.0)	1.00	695.00	\$695.0
6/03/2021	HRW	BL	Prepare search terms for document production in HCMS notes litigation (0.5)	0.50	695.00	\$347.5
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				<u>Hours</u>	Rate	Amount
06/04/2021	LSC	BL	Transmit HCRE document production to additional party.	0.20	460.00	\$92.00
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06/04/2021	HRW	BL	Draft 30(b)(6) deposition notice directed to HCMS	0.60	695.00	\$417.00
06/04/2021	HRW	BL	and HCRE (0.6) Send production for NexPoint discovery demands re: notes litigation to opposing counsel (0.1)	0.10	695.00	\$69.50

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				Hours	Rate	Amount
06/06/2021	HRW	BL	Review HCMFA motion to amend (1.0)	1.00	695.00	\$695.00
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06/07/2021	JAM	BL	Review/revise Rule 30(b)(6) deposition notice for HCRE (0.1); e-mail to H. Winograd re: Rule 30(b)(6) deposition notice for HCRE (0.1); review/revise Rule 30(b)(6) deposition notice for HCMS (0.1); e-mail to H. Winograd re: Rule 30(b)(6) deposition notice for HCMS (0.1).	0.40	1245.00	\$498.0

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				Hours	<u>Rate</u>	Amount
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06/07/2021	HRW	BL	Communications with DSI re: HCMS discovery (0.2)	0.20	695.00	\$139.00
06/07/2021	HRW	BL	Draft R&Os to HCMS discovery (2.6)	2.60	695.00	\$1.807.00
06/07/2021	HRW	BL	Draft search terms for HCMS document production (1.0)	1.00	695.00	\$695.00
06/07/2021	HRW	BL	Edit and review 30(b)(6) deposition notice directed to HCMS and HCRE (0.2)	0.20	695.00	\$139.00
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				Hours	Rate	Amount
06/08/2021	HRW	BL	Communications with DSI re: HCMS discovery (0.3)	0.30	695.00	\$208.50
06/08/2021	HRW	BL	Draft R&Os to HCMS discovery (1.5)	1.50	695.00	\$1,042.50
06/08/2021	HRW	BL	Draft search terms for HCMS document production (1.0)	1.00	695.00	\$695.00
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06/09/2021	JNP	BL	Review of motion to amend answer.	0.10	1295.00	\$129.50
06/09/2021	JNP	BL	Review motion to modify answer and emails regarding same.	0.20	1295.00	\$259.00
06/09/2021	JMF	BL	Review motion for leave to amend answer.	0.30	1050.00	\$315.00

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				<u>Hours</u>	Rate	Amount
06/09/2021	JAM	BL	Review/revise R&Os to HCMS's discovery requests (0.7); e-mails with H. Winograd re: R&Os to HCMS's discovery requests (0.1).	0.80	1245.00	\$996.00
06/09/2021	LSC	BL	Preparation of document production to HCMS, including redaction of certain documents, and correspondence with H. Winograd regarding the same.	5.70	460.00	\$2,622.00
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06/09/2021	HRW	BL	Draft R&Os for HCMS discovery demands (4.3)	4.30	695.00	\$2,988.50
06/09/2021	HRW	BL	Communicate with L. Canty re: HCMS document production (0.7)	0.70	695.00	\$486.50
06/09/2021	HRW	BL	Organize and review document production for HCMS (1.3)	1.30	695.00	\$903.50
06/09/2021	HRW	BL	Send HCMS productions in response to document requests (0.2)	0.20	695.00	\$139.00
06/09/2021	HRW	BL	Communicate with client re: R&OS to HCMS discovery and verification (0.2)	0.20	695.00	\$139.00
06/10/2021	IDK	BL	Office conference with J Morris re upcoming hearing this morning on notes litigation and presentation.	0.30	1325.00	\$397.50

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			conference with H. Winograd re: subpoena for PwC (0.1); telephone conference with D. Klos re: subpoena for PwC (0.1).	Hours	Rate	Amount
06/10/2021	LSC	BL	Research in connection with subpoena and correspondence with H. Winograd regarding the same.	0.90	460.00	\$414.00
06/10/2021	LSC	BL	Prepare for and assist at hearing on motion to amend.	3.00	460.00	\$1,380.00
06/10/2021	GVD	BL	Attend hearing on motion to amend notes	2.50	950.00	\$2,375.00
06/10/2021	HRW	BL	Call with J. Morris re: PwC subpoenas (0.1)	0.10	695.00	\$69.50
06/10/2021	HRW	BL	Call with G. Demo re: HCMFA motion to amend (0.1)	0.10	695.00	\$69.50
06/10/2021	HRW	BL	Review HCMFA motion to amend (1.2)	1.20	695.00	\$834.00
06/10/2021	HRW	BL	Draft opposition to HMCFA motion to amend (0.6)	0.60	695.00	\$417.00
06/10/2021	HRW	BL	Draft document and deposition subpoenas for PwC (2.6)	2.60	695.00	\$1,807.00
06/10/2021	HRW	BL	Call with L. Canty re: PwC subpoenas (0.1)	0.10	695.00	\$69.50
06/10/2021	HRW	BL	Hearing on HCRE/HCMS motion to amend answer (1.0)	1.00	695.00	\$695.00
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				Hours	Rate	Amount
06/11/2021	JNP	BL	Review emails regarding consolidation of notes litigation.	0.10	1295.00	\$129.50
6/11/2021	JNP	BL	Review of response to motion to quash.	0.10	1295.00	\$129.50
06/11/2021	JNP	BL	Conference with J. Seery, Robert J. Feinstein and Gregory V. Demo regarding status of Sentinel matters and next steps.	0.50	1295.00	\$647.50
06/11/2021	GVD	BL	Conference with J. Morris and H. Winograd re status of HCMFA amended answer	0.50	950.00	\$475.00
06/11/2021	GVD	BL	Correspondence with D. Rukavina re amendments to notes litigation	0.20	950.00	\$190.00
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06/11/2021	HRW	BL	Draft subpoenas and ancillary documents for PwC in connection with HCMS notes litigation (1.6)	1.60	695.00	\$1,112.00
06/11/2021	HRW	BL	Send PwC subpoena to representative of PwC for HCMS notes litigation (0.2)	0.20	695.00	\$139.00
06/11/2021	HRW	BL	Communicate with local counsel and J. Morris re: subpoenas for PwC for HCMS notes litigation (0.6)	0.60	695.00	\$417.00
06/11/2021	HRW	BL	Meeting with client for notarization of ROG verification in connection with HCMS R&Os in notes litigation (0.1)	0.10	695.00	\$69.50

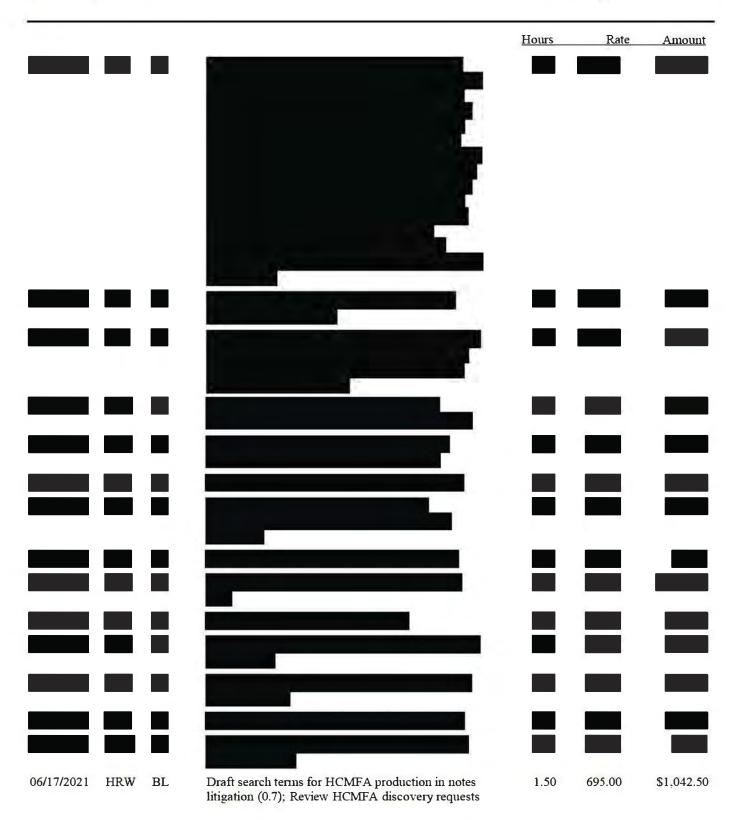
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				<u>Hours</u>	Rate	Amount
06/11/2021	HRW	BL	Communications with client and notary for ROG verification in connection with HCMS R&Os in notes litigation (0.1)	0.10	695.00	\$69.50
06/11/2021	HRW	BL	Send opposing counsel ROG verification for HCMS R&Os in notes litigation (0.1)	0.10	695.00	\$69.50
06/11/2021	HRW	BL	Call with J. Morris and G. Demo re: HCMFA motion to amend answer in notes litigation (0.5)	0.50	695.00	\$347.50
06/11/2021	HRW	BL	Draft 30(b)(6) deposition notices for HCMFA and NPA for notes litigations (0.4)	0.40	695.00	\$278.00
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06/14/2021	JAM	BL	E-mails w/D. Rukavina re: discovery in the notes litigation against the Advisors (0.3).	0.30	1245.00	\$373.50

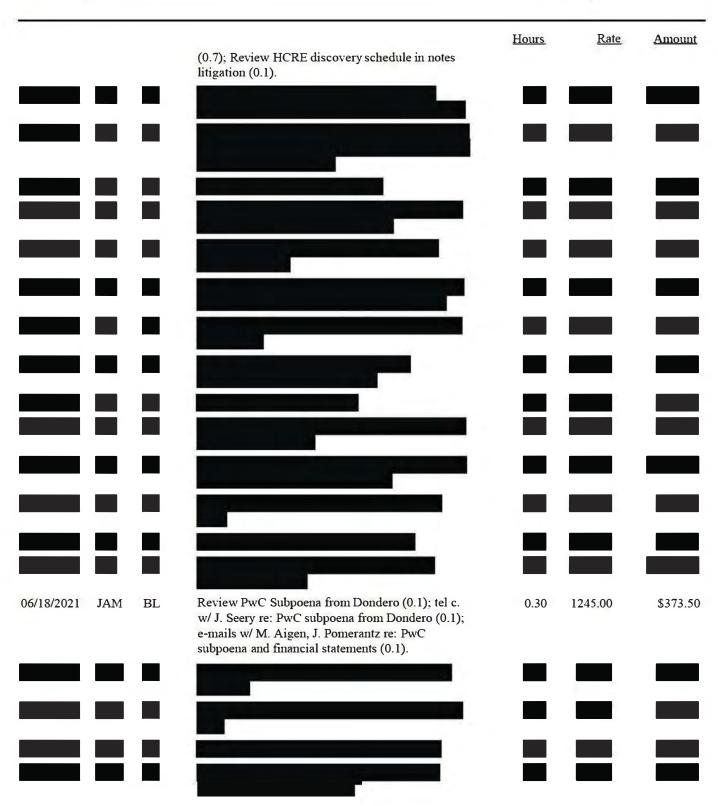
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				<u>Hours</u>	<u>Rate</u>	Amount
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06/16/2021	JAM	BL	Draft e-mail to counsel for defendants in notes litigation re: discovery, proposed amendments (0.8).	0.80	1245.00	\$996.00
06/16/2021	JAM	BL	Review/revise e-mail to counsel for defendants in notes litigation re: discovery, proposed amendments (0.4).	0.40	1245.00	\$498.00
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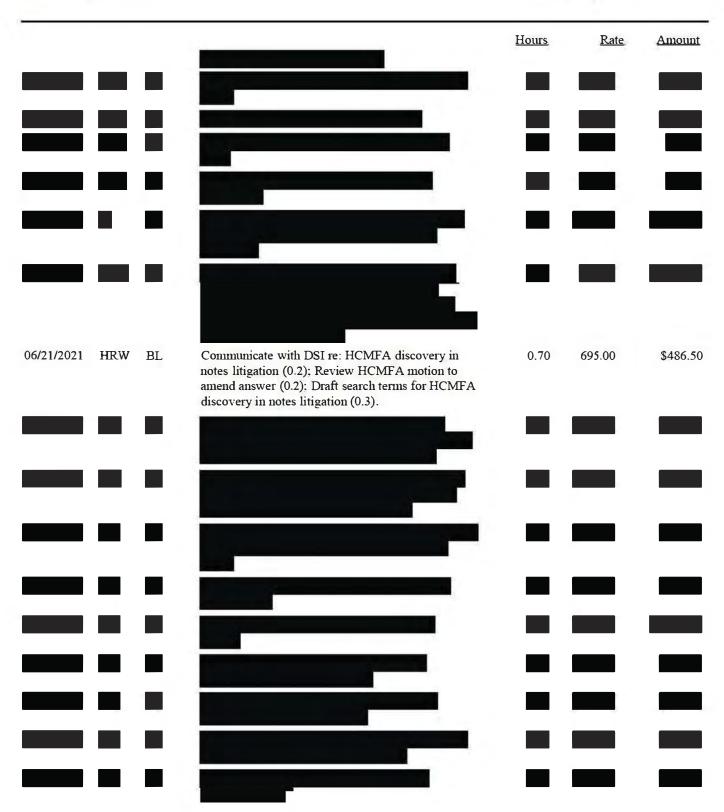
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				Hours	Rate	Amount
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06/21/2021	JNP	BL	Email to and from Gregory V. Demo regarding concerns with note defendant disposing of assets.	0.10	1295.00	\$129.50
06/21/2021	JAM	BL	Communications w/ M. Aigen, counsel for all	0.30	1245.00	\$373.50
00/21/2021	JAM	DL	defendants, J. Pomerantz, G. Demo, H. Winograd re: discovery and schedule for notes litigations (0.3).	0.30	1243.00	\$373.30

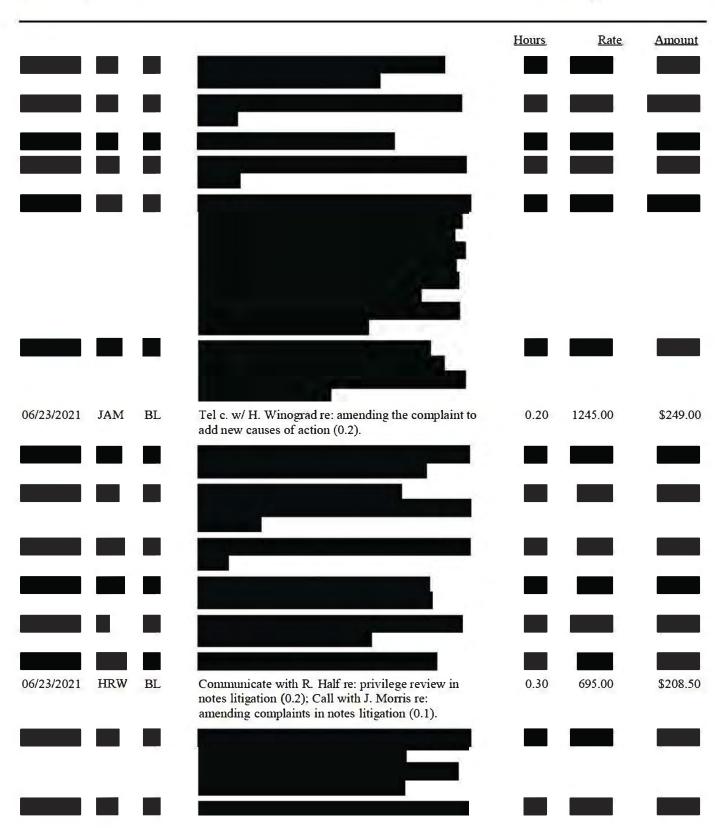
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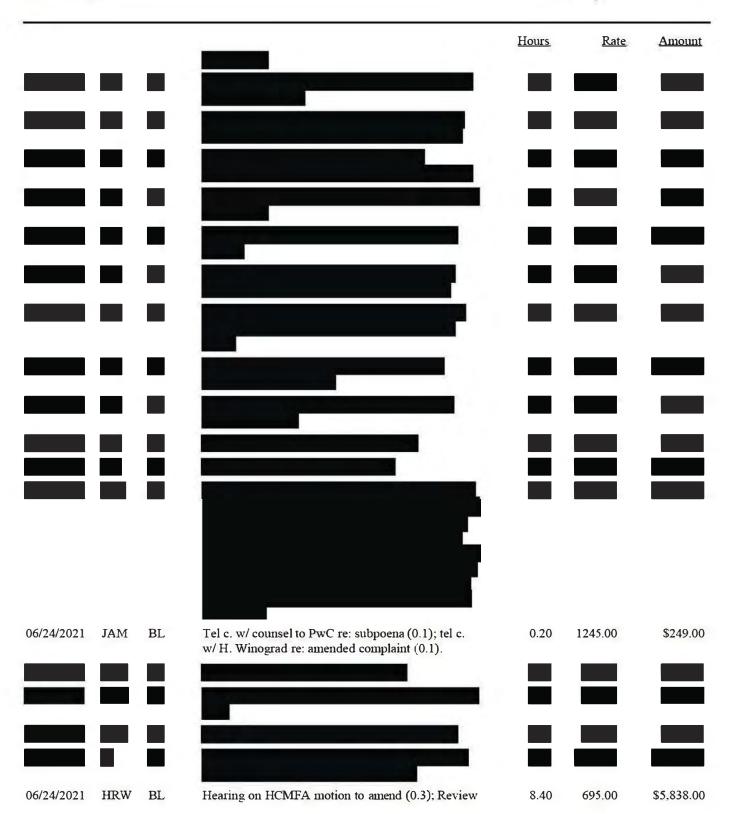
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				Hours	Rate	Amount
			HCMFA proposed order (0.1); Call with J. Morris re: amending complaints in notes litigations (0.1); Research re: fraudulent transfer and other newly asserted claims for notes litigations (3.7); Draft amended complaint for notes litigation (3.2); Communicate with R. Half re: privilege review for notes litigations (0.1); Draft R&Os for HCMFA second RFPs (0.9).	_		
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06/25/2021	IDK	BL	E-mails with G Demo re issues on Dondero conversion of HCMFA to holding company and impact on note litigation, and related background to same, including memo from Wilmer Hale on same.	0.40	1325.00	\$530.00
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06/25/2021	JAM	BL	Tel c. w/ H. Winograd re: amended complaints for notes litigation (0.3).	0.30	1245.00	\$373.50
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06/25/2021	GVD	BL	Correspondence with J. Morris and H. Winograd re preparation for amendment to the notes litigation	0.30	950.00	\$285.00

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				Hours	Rate	Amount
06/25/2021	HRW	BL	Draft amended complaint for notes litigation (3.8); Call with J. Morris re: amended complaints for notes litigation (0.2); Research re: additional claims in notes litigation (2.0); Review HCMFA discovery and production (0.2); Send counsel for HCMFA first production (0.1); Review outstanding litigation critical dates (0.4).	6.70	695.00	\$4,656.50
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06/27/2021	JAM	BL	Review/revise draft Amended Complaint against	1.50	1245.00	\$1,867.50
			Dondero (1.2); e-mails w/ H. Winograd, G. Demo re: revised Amended Complaint against Dondero (0.3).	-	_	_
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06/27/2021	HRW	BL	Draft amended complaint for notes litigation (6.5); Research re: additional claims for amended claim in notes litigation (1.0).	7.50	695.00	\$5,212.50

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06/28/2021	JNP	BL	Review amended complaint.	0.20	1295.00	\$259.00
06/28/2021	JNP	BL	Conference with John A. Morris regarding amended complaint.	0.20	1295.00	\$259.00
06/28/2021	JNP	BL	Email to and from Ira D. Kharasch and J. Elkin regarding research regarding withdrawal of the reference and amended complaints.	0.20	1295.00	\$259.00

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				<u>Hours</u>	Rate	Amount
06/28/2021	HRW	BL	Draft amended complaint for notes litigation (1.6); Research re: additional claims for amended claim in notes litigation (1.0); Review HCMFA R&Os and production to discovery requests (0.4); Send HCMFA R&Os and production to opposing counsel (0.1); Call with L. Canty re: HCMFA production (0.1); Draft R&Os to HCRE discovery requests in notes litigation (0.6).	3.80	695.00	\$2,641.00
06/29/2021	JNP	BL	Review opposition to motion to withdraw reference.	0.30	1295.00	\$388.50

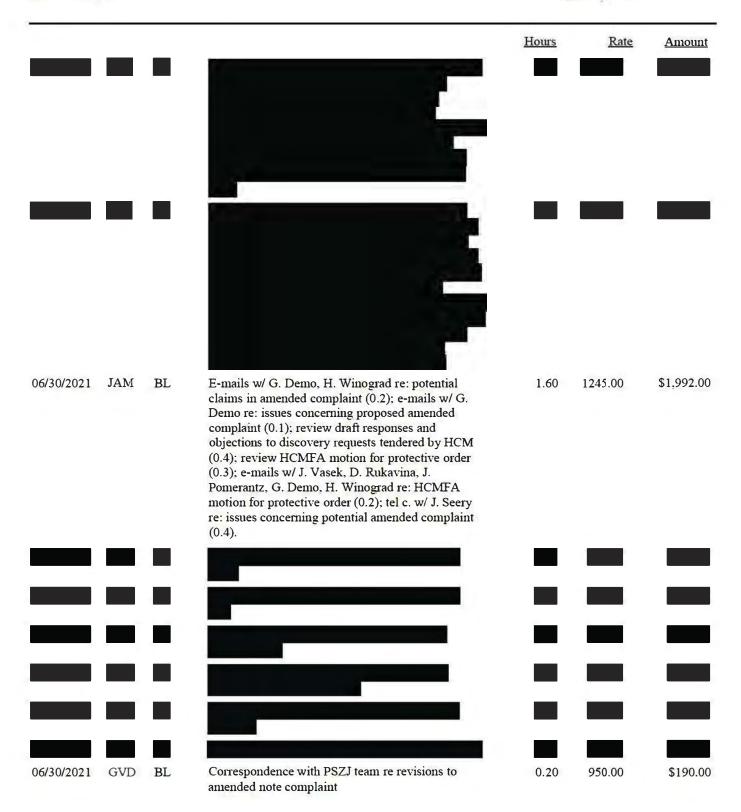
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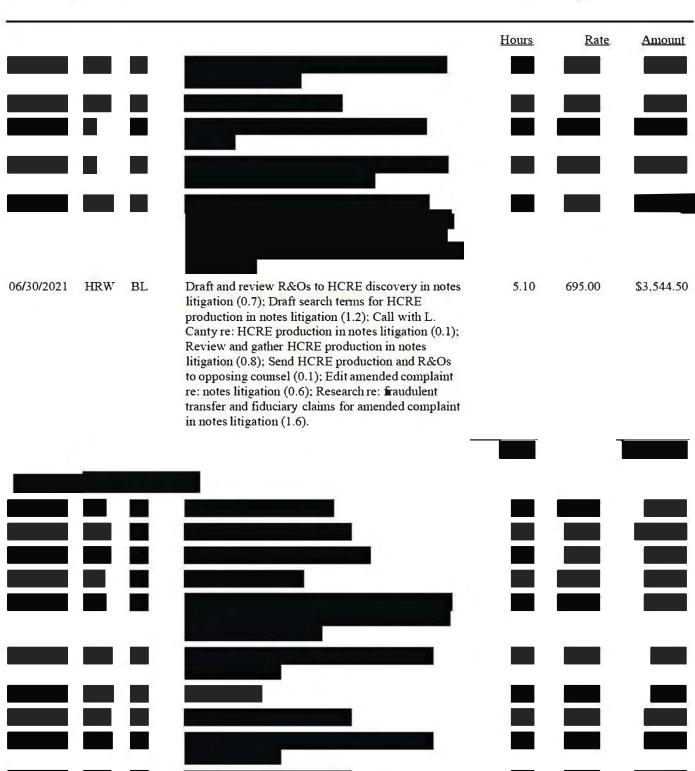
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06/29/2021 HRW BL Research re: amended complaint for notes litigations (1.2); Review amended complaint re: notes litigations (0.5); Draft ReXos for HCRE discovery requests in notes litigation (1.4).	rs Rate Am	<u>Hours</u>				
(1.2); Review amended complaint re: notes litigations (0.5); Draft R&Os for HCRE discovery requests in notes litigation (1.4).	-					
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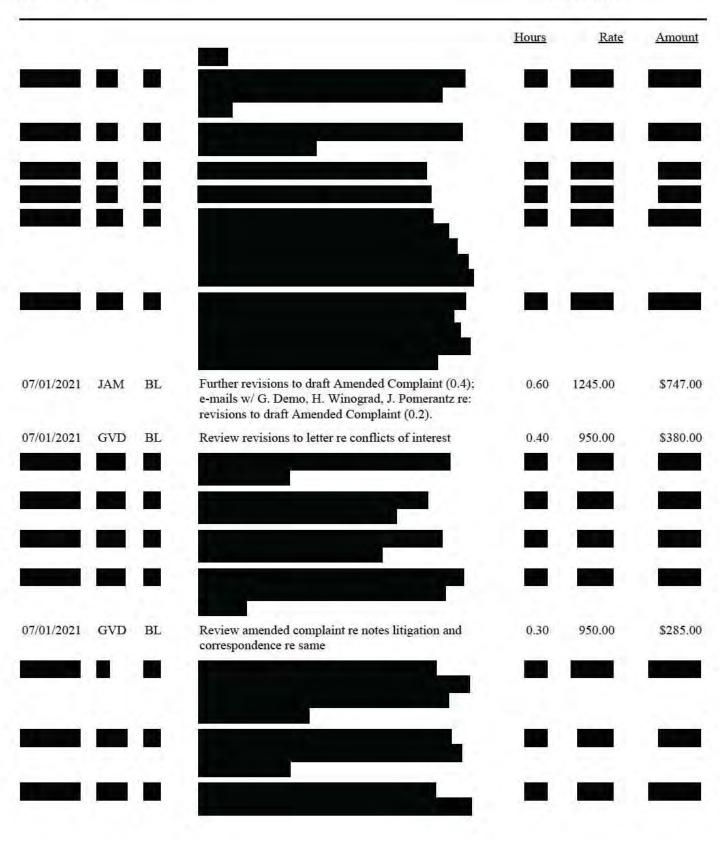
Board of Directors Highland Capital Management LP 300 Crescent Court ste. 700 Dallas, TX 75201 July 31, 2021 Invoice 128292 Client 36027 Matter 00002 JNP

RE: Postpetition

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 07/31/2021



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				Hours	Rate	Amount
07/01/2021	HRW	BL	Edit and review amended complaint for notes litigation (0.6); Assist client re: verification for HCRE interrogatories in notes litigation (0.1); Review supplemental production for HCMFA and NPA notes litigations (0.1); Send verification for HCRE interrogatories to opposing counsel in notes litigation (0.1).	0.90	695.00	\$625.50
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				Hours	Rate	Amount
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07/02/2021	HRW	BL	Review supplemental production for HCMFA and NPA notes litigations (0.2); Send supplemental production for HCMFA and NPA notes litigations to opposing counsel (0.1).	0.30	695.00	\$208.50
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07/03/2021	GVD	BL	Correspondence with J. Elkin re fraudulent	0.20	950.00	\$190.00
07/03/2021	JE	BL	conveyance actions in notes litigation Review additional transcripts and pleadings on fraudulent transfers; correspondence with Mr. Morris and Mr. Demo.	5.30	1195.00	\$6,333.50

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				<u>Hours</u>	Rate	Amount
07/07/2021	JNP	BL	Review Bankruptcy Court report and recommendation to District Court regarding withdrawal of reference.	0.10	1295.00	\$129.50
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07/07/2021	JMF	BL	Review report and recommendations re notes adversary proceedings.	0.60	1050.00	\$630.00
07/07/2021	JAM	BL	E-mails w/D. Rukavina re: proposed amended complaint (0.2).	0.20	1245.00	\$249.00

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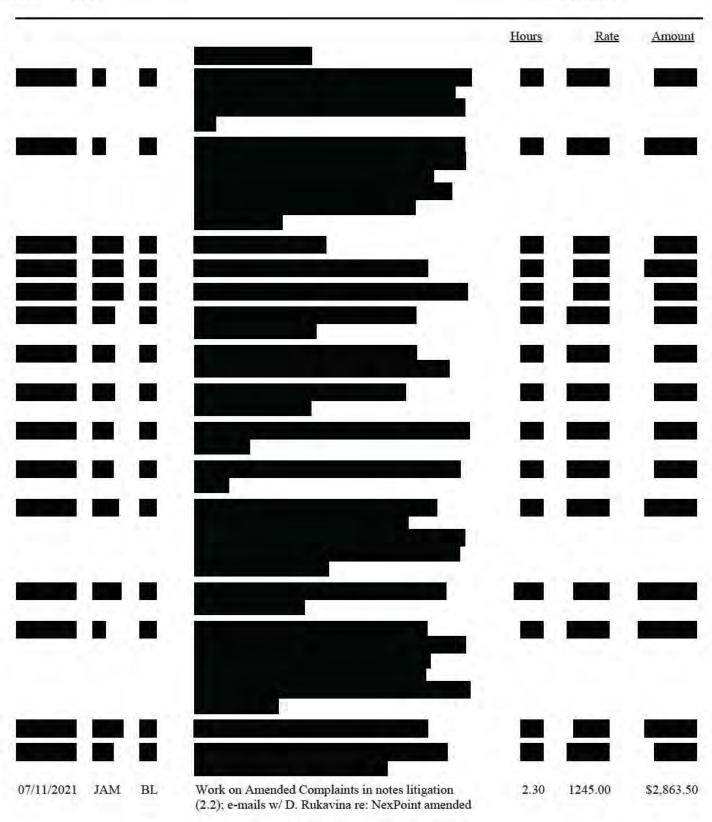
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07/08/2021	JE	BL	Review certain documents relating to note suits (.5);	0.90	1195.00	\$1,075.5
			call with Mr. Pomerantz, Mr. Morris and Mr. Demo regarding reference issues, preference issues and			
			jury trials (.4).			
07/08/2021	HRW	BL	Send production to counsel for HCRE (0.1).	0.10	695.00	\$69.5
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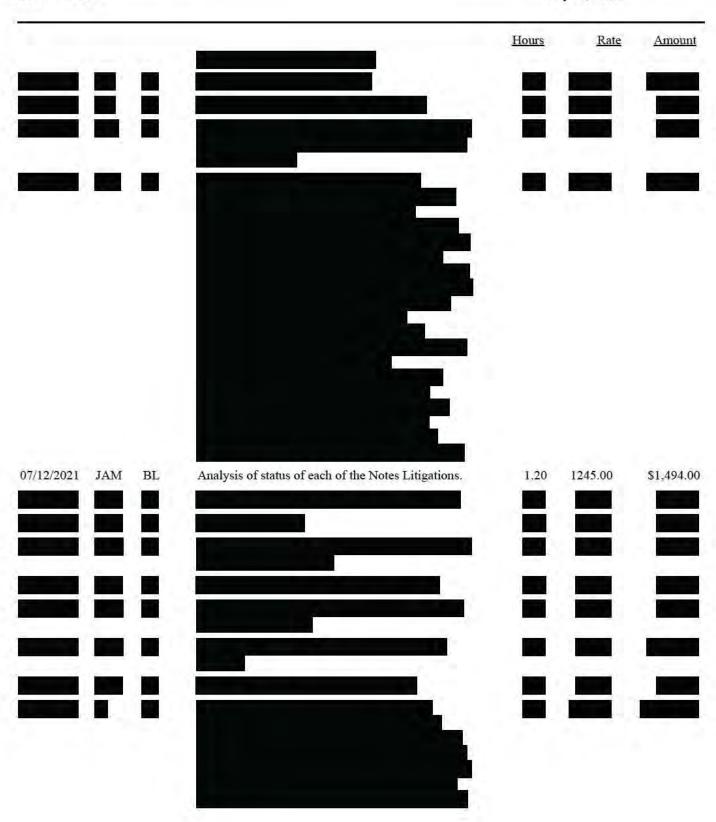
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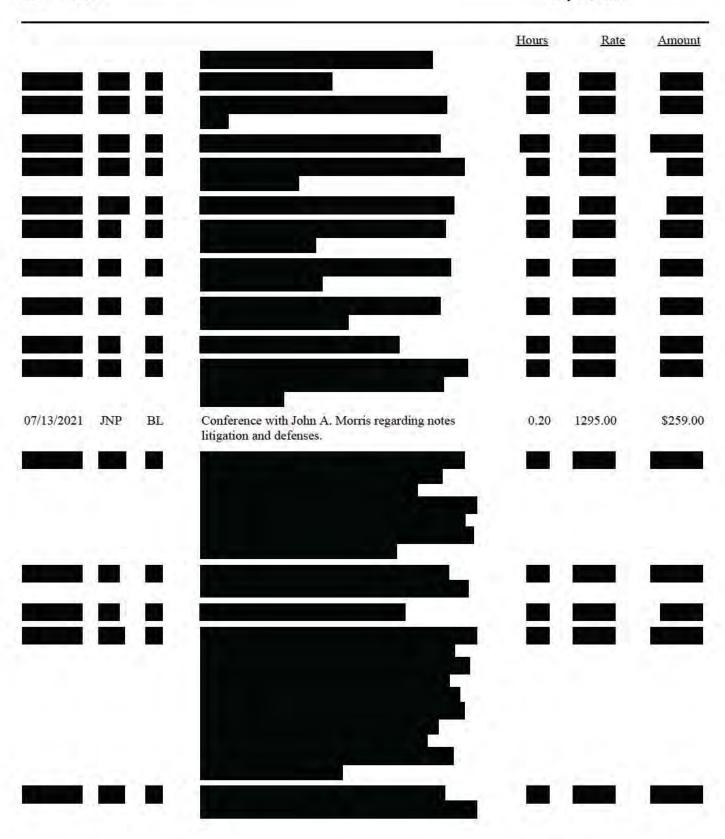
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				<u>Hours</u>	<u>Rate</u>	Amount
07/13/2021	JAM	BL	E-mail to D. Rukavina re: NexPoint amended answer (0.2); e-mails w/ D. Klos, J. Seery re: HCMFA amended answer (0.2); review revise draft Amended Complaint for Dondero (0.4); review/revise draft Amended Complaint for HCMFA (0.9); review/revise draft Amended Complaint for NexPoint (0.9); review/revise draft Amended Complaint for HCRE (0.9); review/revise draft Amended Complaint for HCM Services, Inc. (0.9); draft e-mail to M. Aigen and other defense counsel re: schedule and related matters (0.6); e-mail to J. Seery re: amended complaints and HCMFA (0.2); tel c. w/ J. Seery re: HCMFA proposed amended complaint (0.2); e-mail to M. Aigen and other defense counsel, J. Pomerantz, G Demo re: Amended Complaints (0.1).	5.50	1245.00	\$6,847.50
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